TAB 14-ZIDELL

ZIDELL DISMANTLING DOCUMENTS

FROM

ECOLOGY AND EPA FILES

MEMORANDUM
Water Pollution Control Commission

	Check
Information	
For Action	
Permit	
Other	

TO: Gene Asselstine

DATE: March 6, 1969

FROM: R. K. McCormick

SUBJECT: OIL

I received a call today reporting that Zidells in Tacoma has about ten thousand gallons of Bunker C which they are trying to get rid of.

Some weeks ago I called Waite and told him that I had received a call that Zidells had about 40,000 gallons oil that they were trying to get rid of at that time and I never did get to talk to him again to find out what happened to that amount of oil. It might be a good idea to have someone stop in there and see what is going on.

RKM:ms

MEMORANDUM

Water Pollution Control Commission

P. O. Box 829
OLYMPIA, WASHINGTON
98501

	Check
Information	
For Action	
Permit	
Other	

TO: Gene Asselstine & Chuck Melville

DATE: March 5 and 6, 1970

FROM: Ron Robinson

SUBJECT: Zidell Dismantling - Tacoma

This firm had an accidental oil spill on March 4, 1970, and called air pollution in Tacoma to report it, thinking we were in the same agency. Inspection of this oil spill found it was accidental as the ship's hull settled on the grid during the lowering of the tide and a seam split releasing some oil and water from the tanks of this ship. This oil was just some residue left in the tanks which got mixed with incoming tide-water and when the tide went out, likewise the oil. Zidell boomed off the area as much as possible and were catching the oil with straw; they had hired extra men to clean up the oil. In regard to their permit, they were satisfying every condition regarding a spill.

Jack Zidell stated that a tug boat had towed the stern of the ship's hull out away from the dock in order to tie up a navy barge and the junk hull was not pushed back into its original position. This resulted in the rupture of the seam. We have an aerial photograph taken on March 3 of the navy barge in said position.

RSR:pb

FUlton 3-2701

ZIDELL Dismantling Inc.

401 ALEXANDER AVENUE P/O/BOX/512 TACOMA, WASHINGTON
401 Alexander Ave.

March 9, 1970

Mr. Charles Melville
Water Pollution Control Commission
P. O. Box 829
Olympia, Washington 98501

RE: Ex Bellatrix, accidental oil seepage March 4, 1970, Pier 23, Tacoma, Washington.

Gentlemen:

In compliance with the provisions of Pollution Control Commission Waste Discharge Permit No. MMCCXVIII, we wish to report the following steps have been taken with regard to the above-referenced accidental oil seepage. This was discussed verbally with Mr. Ron Robinson of the Washington Pollution Control Commission on March 5th and with Mr. Gerald T. Calkins on March 9th.

A crack apparently developed in the bottom plating of the ex USS BELLATRIX. As soon as seepage of oil was discovered, double and triple log booms were placed around the area 8' to 150' from the crack. Straw was used to pick up the seepage, and an approved chemical, SPILL-X, was applied under pressure according to the directions for use supplied by its manufacturer. At Mr. Robinson's request, the use of SPILL-X was discontinued on March 5th. The remainder of the oil was picked up from the water with straw.

The crack has been plugged with wedges. Canvas weighted with sand has been placed over the inside of it. Seepage has been entirely stopped. Two comprehensive inspections of the area surrounding the seepage have been made by boat, and it appears that no evidence of seepage is to be found in the waters of Commencement Bay outside of the log booms at this date. Clean-up inside of the log-boom area is essentially complete.

Very truly yours,

ZIDELL DISMANTLING, INC.

Jack Zidell

Jack Zidell

JZ/bd

MEMORANDUM

Water Pollution Control Commission

P. O. Box 829
OLYMPIA, WASHINGTON
98501

	Check
Information	
For Action	
Permit	
Other	

TO: Ron/Chuck & Gene

DATE: 3/9/70

FROM: Gerry Calkins

SUBJECT: Zidell Dismantling-Tacoma

I met with Mr. Jack Zidell who showed me the site where the problem occured. The ship is now 100' closer to shore than it was last Wednesday. Clean up is still progressing . They are going to boom off more shore area this afternoon.

I went to Fire Department Headquarters and picked up sample collected by the Tacoma Fire Department.

I checked the beach at the Tyee marina and the pleasure craft at the dock. I was unable to find any problem with oil.

See attached sheet.

GC/lg

TACOMA FIRE DEPARTMENT - FIRE PREVENTION BUREAU

INSPECTION REPORT

ADDRESS [illegible] DATE [illegible] PERMIT # [illegible]

OCCUPANT [illegible] Ship dismantling OCCUPANCY TYPE ____

OWNER ____ CONTACT ____

Building: B RC PS IC CBl F ____ Story Fuel ____ Tank ____

Inspection ____ Refer to ____

This office received a complaint of oil polluting [illegible] the water on [illegible]. This was checked out [illegible] high tide [illegible]. The oil slick was about [illegible] There was [illegible] extended approximately 2 blocks in [illegible] ship dismantling located at [illegible] point [illegible] skiff [illegible] they [illegible] the water at this point [illegible] fuel [illegible] leak [illegible] the oil was still leaking [illegible]

Reinspect In ____ Days (Over) INSPECTOR [illegible signature]

046

POLLUTION COMPLAINT REPORT FORM

File No. _____ Date 3/10/70

Investigator Don Robison

I. Complaint Reported By:

1. Name _____ Phone No. _____
2. Address _____
3. Date and time complaint first noted _____
4. Other information _____

II. Location:

1. Stream or watercourse Hylebos Waterway
2. Town Tacoma County Pierce
3. Landmark Brown's Point

REGION : SW
DISTRICT : (

III. Pollutant:

SOURCE : 0237

1. Pollutant material Black oil - 0203
2. Area or miles affected Moderate spill
3. Describe effects (color, slick, etc.) (If dead or dying fish are visible, fill out Nos. VII and VIII)
Black heavy Slick

QUANTITY : unknown Ship was being dismantled and caught fire.

IV. Responsibility:

1. Person or entity: Name Zidell Dismantling Co - 08
Address Tacoma Wash Phone No. _____
2. If responsible party is ship's crew obtain: Name of ship _____
Ship's Captain _____
Owner _____ Address _____
Agent _____ Address _____

CAUSE : 01

V. Miscellaneous:

1. Were pictures taken _____
2. Were samples taken _____ Where _____
3. Individuals notified _____
4. Witnesses: Name _____
Address _____
5. Attachments _____

VI. Complaint Received By:

1. Name _____
2. Time and Date _____

3F - 3/10/70

ZIDELL EXPLORATIONS, INC.

3121 S.W. MOODY AVENUE
PORTLAND, OREGON · 97201
228-8691 · AREA CODE 503

EXHIBIT "A" #3

July 21, 1970

State of Washington
Department of Ecology
P. O. Box 829
Olympia, Washington 98501

Attention: Mr. Ronald Robinson

Gentlemen:

It becomes necessary to ballast ships to raise a portion out of the water to facilitate dismantling. This is the cause for our pumping sea water into clean holds and then discharging back into the bay.

We plan that our sewer system will be incorporated into the nearly completed system which should be ready for hook up some time in 1972.

The problem of oil contamination will be greatly minimized by our replacing oil storage tanks further away from the bay, thus eliminating an accident caused by weather, sabotage, etc.

In conjunction with this, we will keep a minimum of 10 dry bales of straw on hand at all times plus two barrels of an approved oil dispersant which will not be used unless your office is notified that we desire to do so.

If there are any questions concerning the equipment, procedure or personnel involved in this matter, kindly contact me, for any inquiries will be immediately acknowledged and any of your board's recommendations will be carefully considered.

Very truly yours,

ZIDELL EXPLORATIONS, INC.

Douglas W. Bollam
Environmental Control Supervisor

DWB:jn

M E M O R A N D U M

July 16, 1970

TO: Chuck Melville and Files

FROM: Ron Robinson

SUBJECT: Zidell Dismantling Co. - Tacoma

I met with Doug Bollem to discuss the waste discharge permit application that they will be sending us soon. Mr. Bollem is responsible for this program for Zidell.

While this firm discharges only sea water which is used for ballast and then returned uncontaminated to the harbor, I feel we should have a condition in their permit covering this. (Oily ballast tanks)

This firm is very anxious to comply with anything we recommend and in the future they will not be storing any oils. The Aero Oil Co. of Tacoma will remove the oils from the ships to be dismantled before any work is done on them and their oil hauled away.

Mr. Bollem would like to know of any materials or equipment that would be useful in case of an oil spill from their operations. They have, on hand, straw and log booms at all times.

I also suggested that this firm not dump anymore solid waste which is removed from the ship onto the tidelands. I was assured that this practice would be stopped at once.

RR:jn

MEMORANDUM

Water Pollution Control Commission

P. O. Box 829
OLYMPIA, WASHINGTON
98501

Check
Information
For Action
Permit
Other

TO: Chuck Melville and Files

DATE: July 30, 1970

FROM: Ron Robinson

SUBJECT: Zidell Dismantling - Tacoma

~~spill cleanup material to this firm~~. Jack Zidell is not dumping the waste material from his operations onto the tideland at this time, as I had requested. But he is concerned about where to dump this debris as the City of Tacoma will not give Zidell's garbage hauler a permit to dump at the city dump.

RR:jn

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
OLYMPIA, WASHINGTON

Permit No. T-3453

In accordance with Chapter 90.48 RCW,
and Chapter 372-24 W.A.C.
A WASTE DISCHARGE PERMIT is issued to:

Date of Issue September 16, 1970

Date of Expiration December 31, 1972

Zidell Dismantling, Inc.
401 Alexander Avenue
Tacoma, Washington 98401

Waste from the permittee's industrial operation located at Tacoma, Washington not exceeding 5,000 gallons per day may be discharged to Hylebos Waterway in the City of Tacoma at the following point of discharge: West side of the mouth of the Hylebos Waterway.

Said discharge is authorized subject to the following conditions:

1. The word "waste" in the above statement refers to the total volume of cooling and contaminated waters to be discharged.

2. During ship dismantling operations, all precautions shall be taken to prevent oil or oily materials from entering the state waters. Solid waste materials, steel scrap, lumber, etc., are to be disposed of on land and shall not be allowed to enter the water or stored where they might accidentally enter the water.

3. All oily residues washed from the ships being dismantled shall be stored or disposed of in some manner to prevent them from entering the state waters. No ballast water containing oil shall be discharged to the waterway.

4. If oil is spilled during a dismantling operation, the spill must be surrounded with a suitable boom and the oil recovered by use of straw or some absorbent material. Special oil dispersant chemicals shall not be used without prior approval from this agency.

5. Sanitary sewage is to be disposed of via existing facilities in accordance with the regulations of the Tacoma-Pierce County Health Department. Sanitary sewage shall be discharged to the municipal sewerage system as soon as available but not later than December 31, 1972.

6. In the event the permittee is temporarily unable to comply with any of the above conditions of this permit, due to breakdown of equipment or other cause, the permittee is to immediately notify this department. This report is to include pertinent information as to the cause and what steps are being taken to correct the problem and prevent its recurrence.

This permit does not allow the discharge of wastes other than those mentioned herein. A new application shall be submitted whenever a change in the waste to be discharged is anticipated.

Permit No. T-3453

Zidell Dismantling, Inc.
401 Alexander Avenue
Tacoma, Washington 98401

Date of Issue September 16, 1970

Date of Expiration December 31, 1972

This permit is subject to termination if the department finds: (1) That it was procured by misrepresentation of any material fact or by lack of full disclosure in the application; (2) That there has been a violation of the conditions thereof; (3) That a material change in quantity or type of waste disposal exists.

In the event that a material change in the conditions of the state waters utilized creates a dangerous degree of pollution, the department may specify additional conditions to this permit.

Signed _____
Assistant Director
Department of Ecology

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

DANIEL J. EVANS
GOVERNOR

JOHN A. BIGGS
DIRECTOR

P. O. Box 829 - Olympia 98501

January 20, 1971

Certified Mail

Zidell Dismantling, Inc.
401 Alexander Avenue
Tacoma, Washington 98401

Gentlemen:

Enclosed please find "Notice of Penalty Incurred and Due", Docket No. DE 71-105, together with a form entitled "Acknowledgment of Service" pertaining to said Notice. Please sign the original of the aforementioned form and return the same to this office.

The violation cited in the enclosed Notice was investigated by this agency as a result of a complaint filed by concerned persons after observing an oil slick in the Hylebos Waterway which was determined to have originated at your facility. The action required by Zidell Dismantling, Inc. with respect to the enclosed Notice is self-evident. If you have questions concerning the nature of the violation, please contact Mr. George Houck, District Engineer, telephone Olympia 753-2356.

The discharge of oil into public waters of this state is an extremely sensitive issue and is of significant concern to the public and to the Department of Ecology. Your industrial waste discharge permit No. T-3453 was written with recognition of the potential that small accidental spills of oil might occur during ship dismantling operations and established certain conditions to be met by Zidell Dismantling, Inc. to minimize the adverse effects of accidental losses of oil into the public water involved. We strongly recommend that you review your operational procedures to insure that all concerned personnel are aware of the requirements oulined in your waste discharge permit and that maximum effort is made to comply with the stated permit conditions. Also, we advise you that any negligent or intentional acts that result in the discharge of oil into public waters will subject Zidell Dismantling, Inc. to a penalty in an amount up to $20,000.00 as provided for by RCW 90.48.350.

Also enclosed for your information and guidance is a copy of the State of Washington Water Pollution Control Laws, Chapter 90.48 RCW. Your attention is invited to Sections 90.48.315 through 90.48.360.

Very truly yours,

JOHN A. BIGGS
Director

E. M. SPURGIN
Chief Enforcement Officer

EMS:dn

enclosures

DEPARTMENT OF ECOLOGY

IN THE MATTER OF THE ASSESSMENT OF PENALTY AGAINST ZIDELL DISMANTLING, INC.	)))	NOTICE OF PENALTY INCURRED AND DUE Docket No. DE 71-105

TO: Zidell Dismantling, Inc.
401 Alexander Avenue
Tacoma, Washington 98401

Notice is hereby given that you have incurred, and there is now due from you, a penalty in the amount of $300.00 under the provisions of RCW 90.48.144.

The basis for this penalty is that on the 15th day of December, 1970, Zidell Dismantling, Inc. (permittee) did violate water pollution control laws of this state and certain conditions of industrial waste discharge permit No. T-3453, said permit having been issued by the Department of Ecology on September 16, 1970, as follows:

1. Permitted oil residues to be discharged into the Hylebos Waterway, a public water of this state, during certain ship dismantling operations thereby violating Condition No. 3 of Permit No. T-3453 and RCW 90.48.080.

2. The permittee having experienced a loss of oil to the Hylebos Waterway during a ship dismantling operation, did not control and remove the spilled oil, thereby violating Condition No. 4 of Permit No. T-3453.

3. The permittee did not notify this agency of the cited occurrence and/or a temporary inability to comply with the conditions of Permit No. T-3453, thereby violating Condition No. 6 of Permit No. T-3453.

RCW 90.48.144 authorizes the assessment of a penalty in the amount of one hundred dollars ($100.00) a day for each violation as set forth in said section. The section further provides:

> "The Director may, upon written application therefore, received within fifteen days, and when deemed in the best interest to carry out the purposes of this chapter, remit or mitigate any penalty provided in this section . . ."

(In regard to implementation hereof, the Director of the Department of Ecology has delegated authority pursuant to Sections 8 and 9 of Chapter 62, Laws of 1970, to Assistant Director, JAMES P. BEHLKE. See IN RE Adoption of Emergency Regulations, Department of Ecology Docket No. 70-15.)

The penalty herein described is due and payable by you within fifteen days of your receipt of this Notice. If, however, for any reason, you believe

that the violation herein described did not occur or that you have an explanation as to why it occurred, or any other fact which you believe the Assistant Director should consider with regard to this penalty, and desire to submit an "APPLICATION FOR RELIEF FROM PENALTY", you should set forth these facts on the enclosed form and return it to the Assistant Director within fifteen days. This form must be signed under oath before a notary public or any other person authorized to take oaths.

Upon receipt of an "APPLICATION FOR RELIEF FROM PENALTY", the Assistant Director will consider the same and will either reduce the penalty, remit the penalty, or allow it to remain as originally stated. You will be duly notified by the Assistant Director of his action.

DATED at Olympia, Washington, this 21st day of January, 1971.

EXECUTIVE ASSISTANT DIRECTOR
Public Services Branch
Department of Ecology
State of Washington

Copies of this Notice are
distributed as follows:

1. Department of Ecology Docket No. DE 71-105
2. Zidell Dismantling, Inc. (2 copies)
3. Attorney General

ZIDELL EXPLORATIONS, INC.

3121 S.W. MOODY AVENUE
PORTLAND, OREGON · 97201
228-8661 · AREA CODE 503

August 10, 1972

Mr. Norman O. Thomas
Department of Ecology
Southwest Regional Office
Olympia, Washington 98504

Dear Mr. Thomas:

Enclosed is the record of a meeting between Mr. Jack Zidell, manager of Zidell Dismantling, Inc., and members of his staff and a sheet of information pertaining to events just prior to discovery of an oil leak from the hull of the ex SS CURTIS and steps taken immediately after discovery of the leak.

The purpose of the meeting, as you see, was to ascertain the cause of the leak and to satisfy Mr. Zidell that proper remedial action was taken to stop the leak.

The above is submitted in lieu of a formal report. If it does not contain sufficient information, please advise.

I wish to thank you for your cooperation.

Very truly yours,

ZIDELL EXPLORATIONS, INC.

Robert Mosier
Superintendent of
Environmental Quality

RM:jrb

Oil spill information: ON JULY 5, 1972

Vessel: Ex CURTIS

Pier: pier 23 to pier 25.

Time: started moving at 8:00AM from pier 23 and hit the pier approx. 8:30AM in which the leadman on the ship notified the tug of the happening.

Tugs: PETER FOSS AND the BRYNN. The SHANNON assisted after it got into the bay on th pier 25.

Leak was discovered approx. 9:00 AM when an oil slick was noticed bhhind the vessel.

Vessel docked at pier 25 about 10:00AM.

10:45 AM notified Foss that a tug was needed to round up oil. They informed us one of their tugs called in about oil being in the bay but they didn't know its origin.

11:30AM Chuck from Foss was in the office and said they had a crew out rounding up boom sticks to gather up the oil.

12:00 Noon the Coast Guard was in the office and they had been on the premises a short while

12:15 PM Norman O. Thomas - Dept. of Ecology

Type of oil: Navy special

Spill X was used at the area of seepage

The point of seepage was stbd fwd midship - across port sea chest

The divers arrived here at 1:30PM from International Marine Divers to inspection damage.

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

September 14, 1972

REPLY TO ATTN OF: 10EP M/S #521

Enforcement Division

Mr. Mike Price
Department of Ecology
Southwest Regional Office
P. O. Box 612
Olympia, Washington 98504

Dear Mr. Price:

On a recent visit to Zidell Dismantling, Tacoma, Mr. Larry Kyle, Engineering Aid, noticed a holding tank being emptied to Commencement Bay. Jack Zidell, who was accompaning him, explained that the contents of the holding tank was oily water that had been pumped out of a ships ballast tank.

This discharge seems to be in violation of Zidell's Waste Discharge Permit issued by the Department of Ecology. Enclosed is a copy of Mr. Kyle's trip report. If you have further questions, or I can help in any way, do not hesitate to call (206)442-1270.

Sincerely,

Dan Robison
Washington Field Consultant

Enclosure

ENVIRONMENTAL PROTECTION AGENCY

REPLY TO ATTN OF: 10EP - M/S 521

DATE: September 15, 1972

SUBJECT: Trip Report - Zidell Dismantling, Tacoma Yard, Tacoma, Washington

TO: The Files

Thru: Dan Bodien, Chief, Engineering Section
Dan Robison, Washington State Field Consultant

Zidell Dismantling buys old ships and dismantles them in their yard at 401 Alexander, Tacoma, Washington. Jack Zidell, owner, met me and showed me his facility.

Ships, at this yard, are dismantled in two stages. The first stage is the removal of the super structure and upper deck levels. Sea water is used as ballast in the ships lower compartments to give a ship added stability as the super-structure is removed. To complete the job, the hulk is pushed up an old ship ways and dismantled completely. To accomplish this the greater part of the ballast must be removed. Most of the ballast is pumped directly to the Bay, but any ballast water coming from a compartment which contained traces of oil is pumped to a holding tank. The holding tank is periodically dumped. The water filters through spun fiber glass and absorbant C and then drains to the Bay.

A log boom is used during the final dismantling to protect against oil spills. Mr. Zidell said no further pollution abatement practices were being considered.

On the basis of a letter from Zidell, the Corps of Engineers has exempted Zidell from the Section 13 permit program. Because of the possibility of the discharge of oil traces, Zidell should submit Section 13 permit application.

Larry Kyle

Larry Kyle
Engineering Aid

EPA Form 1320-6 (11-71)

Department of Ecology
State of Washington

Waste Discharge Permit
Application Form

Office Use Only

New Per. _____ Type _____
Expired Permit No. _____ Permit No. _____
Drainage Basin _____ Rec'd _____
Advertising Needed _____ Issued _____
Expired _____

Application is hereby made for a permit to discharge wastes into state waters and/or municipal sewerage systems in accordance with Chapter 90.48 RCW and Chapter 372.24 WAC.

A. NAME OF COMPANY Zidell Dismantling, Inc.

B. MAILING ADDRESS 401 Alexander Avenue

C. PLANT LOCATION Tacoma, Washington 98401

PHONE 383-2701 CONTACT PERSON Jack Zidell

D. TYPE OF INDUSTRY Ship Dismantling

E. WASTE FLOW: (Submit on separate sheet)

Describe in detail the sources, treatment and disposal of all liquid wastes at the plant, including water-process air pollution control equipment. Include a schematic flow diagram showing the sources and flow pattern of all wastes.

F. SOLID WASTE DISPOSAL: (Submit on separate sheet)

Describe the types of solid wastes accumulated at the plant and list the source, volume, storage provision, frequency of removal, and final disposal of each solid waste. Include all sludges, dusts, scraps, trimmings and left-over, spoiled or returned products.

G. WATER SUPPLY:

☐ Private Well — Recorded Water Right No. _____

☐ Surface Water _____ (name of waterway) — Recorded Water Right No. _____

☒ Public System Port of Tacoma (name of system)

Location of private well or plant surface water intake; Section ____ Township ____ Range ____

H. WASTEWATER DISPOSAL:

Maximum Gallons/Day

☐ To Land or Subsurface Ground Disposal _____

☒ To Surface Waterway Hylebos Waterway (name of waterway) — 5000 gallons Average

☒ To Sanitary Sewerage System Port of Tacoma (name of municipal system) _____

Location of Discharge Point(s) and/or Connection(s) to Municipal Sewer System:

Surface run-off - west side of mouth of above waterway

Connect to Port of Tacoma Sanitary System at plant site

I. WATER SUPPLY VOLUMES	Average Gallons/Day	Maximum Gallons/Day
Private Well		
Surface Water		
Public System	5000	
TOTAL	5000	

J. WASTEWATER AND WATER UTILIZATION:	Average Gallons/Day	Maximum Gallons/Day
Sanitary Wastes	5000	
Industrial Wastewater		
Cooling Water Discharge		
Water Incorporated into Product		
Evaporative Loss		
Other (Specify)		
TOTAL	5000	

Check for equality

K. EFFLUENT ANALYSIS: (Submit on separate sheet)

List the physical and chemical properties of the effluent(s) to be discharged, and include a description of the sampling and analytical methods used to derive this information.

L. PLANNED WASTE TREATMENT IMPROVEMENTS: (Submit on separate sheet)

Describe any additional treatment or changes in waste disposal methods in planning or under construction. Connect to Tacoma

M. STORMWATER TREATMENT AND CONTROL:

☒ No Treatment

☐ Treated Stormwater to Waterway

_____
(name waterway)

Type of Treatment

☐ Settling of Sedimentation

☐ Screening or Filtration

☐ Separation or Flotation

☐ Contaminated Stormwater to Sanitary Sewer

Size of Intercepted Area

_____ sq. ft.

Type of Treatment

☐ Settling or Sedimentation

☐ Screening or Filtration

☐ Separation or Flotation

Use Additional Sheets fc :tems N, O, P, and Q, if necess ·.

PLANT OPERATION:	Days per Year	Number of Employees per Shift Day	Night	Swing
Average	250	150	—	—
Maximum	300	150	—	—

O. RAW MATERIALS AND CHEMICALS USED IN PROCESSES:

Brand Name	Chemical, Scientific or Actual Name	Quantity Used per Day * Average	Maximum
None	Sea Water for Ballasting	5000 gals. per day	

P. PRODUCTION:

Item	Quantity Produced Per Day * Average	Maximum
All Types of Ships	Approx. 15 per year	

Q. EXPLAIN ANY SEASONAL VARIATION IN WASTE DISCHARGE VOLUMES, PLANT OPERATIONS, RAW MATERIALS AND CHEMICALS USED IN PROCESSES, AND/OR PRODUCTION:

Production is dependent upon availability of ships and Zidell's needs

The information given on this application is complete and accurate to the best of my knowledge.

ZIDELL EXPLORATIONS, INC.

Jack Zidell

Signature

JACK ZIDELL

Printed

VICE PRESIDENT

Title

10/30/72

Date

*Please specify units. For example: Tons per day, pounds per day, barrels per day.

Zidell Dismantling, Inc.
Waste Discharge Permit Application Form

ITEM E: Waste Flow

Sea water pumped from bay into clean holds of vessels for ballasting. Non-contaminated ballast water discharged to bay.

Sanitary disposal to Port of Tacoma Disposal System. Major quantities of oil from vessels to be dismantled transferred to commercial barge or truck. Residuals discharged into oil storage tanks, thence into commercial trucks.

Flow diagram not applicable.

ITEM F: Solid Waste Disposal

Demolition debris loaded into commercial disposal boxes for disposal by others.

ITEM K:

Nature and disposal facilities precludes physical and chemical analyses.

ITEM L:

Plan to discharge water wastes (no oil) into new Port of Tacoma sewerage facilities as soon as made available to plant site.

MEMORANDUM

INFORMATION ____
FOR ACTION ____
PERMIT ____
OTHER ____

TO: Norm Thomas

FROM: Jim Slaughter

SUBJECT: Lidell Dismantling

DATE: December 22, 1972

State of Washington
Department of Ecology

Subject has large pile of old engine blocks approximately 30 feet from Hylebos waterway. This would pose problems in the event of rain, which would leach old oil, from this pile, into the waterway.

Recommend they install drain system for this area with separator. Because of season would recommend they comply within 60 days of notification.

Harry Tracy

Gary Rothwell

May 10, 1973

On May 7, 1973, I investigated an oil spill at Zidells Dismantling in Tacoma. The people from Zidells were using straw to clean up a black oil spill and found the straw didn't work very well on the lighter sheens. They contacted M.O.P.S. about the use of the oil skimmer stored in Tacoma and learned that it was unavailable becaa no one knew the whereabouts of the key. In light of industry's recent claims about gearing up for oil spills I felt I should make you aware of this latest problem.

WASHINGTON STATE DEPARTMENT OF ECOLOGY
POLLUTION COMPLAINT REPORT FORM

OIL

Complaint No. _____

2. Date of Complaint 10-17-73
3. Date of Investigation 10-17-73

I. Complaint Reported By:

Name JACK ZIDELL Phone No. FU3 2701
Address 401 ALEXANDER TACOMA
Date and time complaint first noted ~~1500~~ 10-16-73 1500
Other information SPILL WAS NOT REPORTED TILL THE NEXT DAY.

II. Location:

4. Watercourse HYLEBOS WATERWAY
5. Region Northwest ( ) Southwest (X) Eastern ( )
6. District (1) X (2) ___
7. County and Town PIERCE TACOMA

III. Pollutant:

8. Pollutant Source FUEL FILL LINE
9. Material BUNKER C
10. Quantity 10 GALS, ABOUT 2 GALS IN THE WATER
Area or miles affected LOCAL
(If dead or dying fish are visible, fill out Nos. IX, X and XI)

IV. Responsibility:

11. Person or entity: Name ZIDELL DISMANTLING INC.
Address 401 ALEXANDER Phone No. FU3 2701
Violator: Confirmed (X) Suspected ( ) Unknown ( )

V. Cause:

12. Brief Description: See memo

VI. Complaint Received By:

Name BOB BOTTMAN
Time and date 0950 10-17-73

VII. Complaint Investigated By: NORM THOMAS

VIII. Miscellaneous:

Were pictures taken? YES
Were samples taken? NO
Individuals and agencies notified EPA - COAST GUARD

Witnesses: Name _____
Address _____
Attachments _____

Oct 17, 1973.

In accordance to the accident of the Oil Spill on the day of Oct. 16, 1973.

It was imperative to break the oil line. After searching the area and taking the nesessary percoution so that no oil would spill overboard, we began to break the oil line. After further inspection was made to insure no oil would leak to the decks below, the last bolt was loosened. Oil began to run out of the pipe, into the containers. after the containers filled the oil ran on to the deck we sent for more Containers

I noticed in the corner some bubbles. seeing the bubbles, I knew it must be draining to the deck below. I tried to stop it with my hand untill it was plugged. In the meantime the oil from the pipe stopped draining. Then we were informed that the oil had spilled over board.

There was approxmely 5 to 8 gal in the Container 2 to 4 gal. on the

deck, no more than 2 feet escape overboard.

In my opinion, the oil spill was an act of negligence. No one certain person was responsible.

The drain was painted and had dirt sediments and was impossible to detect. but it was there, and accidents do happen-!!!

If further information is needed I would be happy to oblige

Sincerely

Robert A. Matthews

Oct 17. 1773

RECOMMENDATION FOR ENFORCEMENT ACTION

TO: Enforcement Officer DATE: 10-25-73

FROM: Norm Thomas

RECOMMEND ENFORCEMENT ACTION BE TAKEN AGAINST:

I. Zidell Dismantling Inc. 401 Alexander
(Name: Company or Individual)
St. Tacoma ZIP Code:

II. For:

A. Operating without a waste discharge permit (RCW 90.48.160)

B. Noncompliance with waste discharge permit conditions (RCW90.48.160)

C. Unlawful discharge of waste into State waters (RCW 90.40.080)

D. Intentional or negligent discharge of oil into State waters (RCW 90.48.350)

1. Type of oil (diesel, gasoline, fuel, bunker C, crude, etc.)

2. Amount of oil spilled (2 gals gallons/barrels)

E. Other

III. The violation occurred at: (Time) 1500 (Date) 10-16-73

IV. Location of incident: Same as I

V. Name of watercourse involved: Hylebos Water Way

VI. Narrative of Discharge incident: (Use separate page or memo if necessary)

See Memo

Note: Discuss clean-up activities in a separate paragraph or section.

Page 2

RECOMMENDATION FOR ENFORCEMENT ACTION Date: 10-25-73

Name of Company or Individual: Zidell Dismantling Inc.

VII. Physical Evidence obtained: Samples ____ Pictures X None ____

VIII. Names and addresses of Witnesses: See Hand

IX. Reasons for recommending enforcement action: (Intentional/Negligent/Other)

Dis/approved _____ (date)

_____ District Engineer

_____ Investigated By

Oil Pollution Investigator Title

Enclosures:
Lab Report, No. _____

Pictures _____

INDORSEMENT

TO: Enforcement Officer Date: _____

FROM: Regional Manager

Recommend enforcement action (not) be taken as proposed.

_____ Regional Manager

MEMORANDUM

CHECK
INFORMATON ____
FOR ACTION ____
PERMIT ____
OTHER ____

TO: Lloyd Taylor

FROM: Jim Thomas

SUBJECT: [illegible] Zidell Dismantling Inc., Tacoma

DATE: October 18, 1973

State of Washington
Department of Ecology

Introduction:

At 0950 on October 17, 1973, Jack Zidell of Zidell Dismantling, Inc., called in an oil spill that occurred the previous day on a ship they were dismantling.

Finding of Fact:

On Tuesday afternoon, October 16, 1973, a burner, Jim Divas, employed by Zidell Dismantling, Inc., cut off the aft port fuel fill valve located on the main deck, from the ~~EX~~ U.S.S. Zaniah, being cut up for scrap. At the time the ship had not been defueled. The management contends the valve was marked "To Not Cut" - the burner stated it was marked "Save." This conflict was not resolved during my investigation. It is relevant to this case, establish a lack of communication within the Company and the fact that led to further action.

In that the valve had been cut off, the balance of the fueling system was vulnerable to fire, necessitating it being blanked off at a lower point. When the fuel fill line was broken at a bulkhead on the middle deck, the first level below the main deck, it discharged over 10 gallons of product into the compartment, then about 2 gallons further ran through an unplugged 1½ inch scupper, down the side of the ship and into the water. This incident happened at about 1500 on October 16, 1973. On scene were: R.A. Matthiesen, Laborer; Bill Simmons, Ships Lead Man; and Harold Spain, Ships Superintendent.

Cleanup was conducted by D & M Welding, 1111 Alexander, Tacoma, contracted by Zidell, Inc.

Conclusions:

Zidell Dismantling, Inc., was negligent in that they did not ascertain if the fuel transfer line contained product prior to breaking it and that they did not have the scupper plugged in the event of an oil discharge from the line.

Recommendations:

That Zidell Dismantling be issued a penalty of $250.00 based on the conclusions of this report.

Appendix: Photographs - in process. Witness statements - 2.

DRAFT-CJ'bd
9-30-74

State of Washington
Department of Ecology
Olympia, Washington 98504

Subject: NPDES Waste Discharge Permit No. WA-003712-5

Gentlemen:

The proposed draft of subject Waste Discharge Permit has been reviewed and these are our comments:

First, a brief explanation of method of dismantling is in order, as it regards ballast water.

Water is pumped from the Waterway into usually the bow end of the vessel, to the point where the angle of declivity is similar to that of the slipway. At high tide the vessel is put on the slip and after the ship is in place, the vessel is dewatered: same water in, same water out.

In the special conditions of the proposed draft, we see no problems in complying with S1. This, of course, assumes that the water used for ballasting is already within the limitations prescribed.

We question if it's the Department of Ecology's intent to receive notification for each and every small bit of oil removed from a vessel and stored, as this is almost a daily occurrence. Or, is it intended that the Department be notified only when oil is being pumped from the vessel to tank trucks or like receivers and in such amounts, much as the Coast Guard is now notified under the Oil Pollution Prevention Regulations.

The value of the former intent is questioned. We believe the latter is what is intended, and this is agreeable.

In condition S2, we question that Item 1 is acceptable, because this means salt water from the bay would be dumped into the municipal system, stopping off only long enough to ballast a ship.

Item 2 would be acceptable except for the value attached to the turbidity daily maximums. This provides for only 15 JTU's. We don't know that the water from the bay is consistently at that point or below. The bay water may be heavy in suspended solids that would be impossible to remove.

As we understand the situation, this requirement is aimed at the discharge of rust or rusty water, and is of visual or aesthetic concern other than a deleterious problem.

In the past, there has been no noticeable turbidity. If there has been, it was apparently inconsequental, as no attention has ever been drawn to it.

Therefore, it is suggested that on page 3 of 7, the daily maximum requirement for turbidity be changed to read: "no appreciable amount of objectionable turbidity", and the sampling method be changed to read: "visual".

Under condition S6, a Spill Prevention, Containment, and Countermeasure Plan is required to be submitted by October 1, 1974.

The same plan is required by the United State Coast Guard, and this plan is now being developed. It will be submitted shortly for their approval. We would like to use the same plan for all agencies. As soon as the Coast Guard approves the plan, we would like to submit it to you for your approval.

It is trusted the above will meet with your approval. If there is any questions we will appreciate the opportunity of meeting with you in Olympia and discussing it further.

Thanking you for your continued help, we are

Respectfully,

TIDELL DISCUNTLING, INC.

Jack Tidell

Jack Tidell
Vice President and General Manager

Permit N WA-003712-5
Issuance Date February 27, 1975
Expiration Date February 28, 1980

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

WASTE DISCHARGE PERMIT

State of Washington
DEPARTMENT OF ECOLOGY
Olympia, Washington 98504

In compliance with the provisions of
Chapter 90.48 RCW as amended
and
The Federal Water Pollution Control Act Amendments of 1972,
Public Law 92-500

Zidell Dismantling, Inc.
401 Alexander Avenue
Tacoma, WA 98421

Plant Location:	401 Alexander Avenue Tacoma, Washington	Receiving Water:	Hylebos Waterway
		Discharge Location:	Lat. 47° 17' 02" W Long. 122° 24' 30" N
Industry Type:	Ship dismantling	Waterway Segment No.:	05-10-01

---

is authorized to discharge in accordance with the special and general conditions which follow.

E. W. Asselstine, Regional Manager
Southwest Regional Office

REVISED 12/29/75

S2. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

After June 1, 1975 and lasting through the expiration date of the permit, the permittee is authorized to discharge subject to the following limitations:

Ballast water only is to be discharged.

	EFFLUENT LIMITATIONS		MONITORING REQUIREMENTS	
Parameter	Daily Average	Daily Maximum	Minimum Frequency	Sample Type
Waste water may be discharged via an approved settling basin and separator to meet the following effluent limitations:				
Flow	NA	15,000 gallons*	Quarterly	Estimate
Oil & Grease	NA	15 mg/l and no visible sheen	Daily when discharging	Visual
Turbidity	NA	15 JTU above receiving water to a maximum of 75 JTU	When discharging	Grab

Domestic sewage shall be discharged to the municipal sanitary sewer system.

When oil and/or other petroleum products are removed from vessels being dismantled, this agency is to be notified. The name and address of the firm removing the oil, the amount of oil and the date is to be recorded and reported with the quarterly monitoring report.

*Discharge in excess of 15,000 gallons per day are permitted when, under emergency conditions, such discharges will prevent damage or loss of property, hazardous conditions, or damage to the environment. Under such circumstances, all other limitations or conditions of this permit remain in effect. Monitoring of the effluent and receiving water shall be conducted as necessary during such discharges to determine compliance with oil and grease and turbidity limitations. A report of the number of such occurrances, along with the daily volumes discharged and the monitoring results shall be submitted with each quarterly monitoring report form.

The daily average is defined as the average of the measured values obtained over a calendar month's time.

The daily maximum is defined as the greatest instantaneous value for any calendar day.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

WASTE DISCHARGE PERMIT

State of Washington
DEPARTMENT OF ECOLOGY
Olympia, Washington 98504

In compliance with the provisions of
Chapter 90.48 RCW as amended
and
The Federal Water Pollution Control Act Amendments of 1972,
Public Law 92-500

Zidell Dismantling, Inc.
401 Alexander Avenue
Tacoma, WA 98421

Plant Location: 401 Alexander Avenue
Tacoma, Washington

Receiving Water: Hylebos Waterway

Discharge Location: Lat. 47° 17' 02" W
Long. 122° 24' 30" N

Industry Type: Ship dismantling

Waterway Segment No.: 05-10-01

---

is authorized to discharge in accordance with the special and general conditions which follow.

R. Jerry Bollen, Assistant Director
Department of Ecology

SPECIAL CONDITIONS

S1. INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the date of issuance of this permit and lasting through June 1, 1975, the permittee is authorized to discharge subject to the following limitations and monitoring requirements:

Ballast water only to be discharged.

	EFFLUENT LIMITATIONS		MONITORING REQUIREMENTS	
Parameter	Daily Average	Daily Maximum	Minimum Frequency	Sample Type
Flow	NA	NA	Quarterly	Estimate
Oil & Grease	NA	15 mg/l and no visible sheen	Daily when discharging	Visual
pH	Shall not be less than 6.5 nor greater than 8.5		When discharging	Grab

When oil and/or other petroleum products are removed from vessels being dismantled this agency is to be notified. The name and address of the firm removing the oil, the amount of oil and the date is to be recorded and reported with the quarterly monitoring report.

All local regulations governing the disposition of sanitary wastes are hereby made a condition of this permit.

The daily average is defined as the average of the measured values obtained over a calendar month's time.

The daily maximum is defined as the greatest allowable value for any calendar day.

S2. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

After June 1, 1975 and lasting through the expiration date of the permit, the permittee is authorized to discharge subject to the following limitations:

Ballast water only is to be discharged.

	EFFLUENT LIMITATIONS		MONITORING REQUIREMENTS	
Parameter	Daily Average	Daily Maximum	Minimum Frequency	Sample Type
Waste water may be discharged via an approved settling basin and separator to meet the following effluent limitations:				
Flow	NA	5000 gallons	Quarterly	Estimate
Oil & Grease	NA	15 mg/l and no visible sheen	Daily when discharging	Visual
Turbidity	NA	15 JTU above receiving water to a maximum of 75 JTU	When discharging	Grab

Domestic sewage shall be discharged to the municipal sanitary sewer system.

When oil and/or other petroleum products are removed from vessels being dismantled, this agency is to be notified. The name and address of the firm removing the oil, the amount of oil and the date is to be recorded and reported with the quarterly monitoring report.

The daily average is defined as the average of the measured values obtained over a calendar month's time.

The daily maximum is defined as the greatest instantaneous value for any calendar day.

S3. SCHEDULE OF COMPLIANCE

a. The permittee shall achieve compliance with the effluent limitations specified for discharges in accordance with the following schedule:

Date	Action
Within ninety days of availability	Connect domestic sewage and waste water to the municipal sanitary sewer system.
OR June 1, 1975	Meet final effluent limitations.

b. The permittee is expected to meet the aforementioned compliance schedule. No later than 14 calendar days following a date identified above the permittee shall submit to the appropriate regional office of the Department a notice of compliance or noncompliance with the specification required in the schedule.

c. Prior to constructing or modifying any wastewater control facilities, detailed plans shall be approved in writing by the Department.

S4. MONITORING AND REPORTING

The permittee shall monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the waste discharged. A record of such data shall be maintained. The permittee shall monitor the parameters as specified in conditions S1 and S2 of this permit.

a. Reporting

Monitoring results obtained during the previous 3 months shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) submitted no later than the 15th day of the month following the completed reporting period. The report shall be sent to Department of Ecology, Southwest Regional Office, Olympia, Washington 98504. Monitoring shall be started April 1, 1975, and the first report is due July 15, 1975, if applicable.

b. Records Retention

The permittee shall retain for a minimum of three years all records of monitoring activities and results, including all reports of recordings from continuous monitoring instrumentation. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the permittee or when requested by the Director.

c. Recording of Results

The permittee shall record each measurement or sample taken pursuant to the requirements of this permit for the following information: (1) the date, exact place, the time of sampling; (2) the dates the analyses were performed; (3) who performed the analyses; (4) the analytical techniques or methods used; and (5) the results of all analyses.

d. Representative Sampling

Samples and measurements taken to meet the requirements of this condition shall be representative of the volume and nature of the monitored discharge.

e. Test Procedures

All sampling and analytical methods used to meet the monitoring requirements specified in this permit shall, unless approved otherwise in writing by the Department, conform to the latest edition of the following references:

1) American Public Health Association, Standard Methods for the Examination of Water and Wastewaters

2) American Society for Testing and Materials, A.S.T.M. Standards, Part 23, Water, Atmospheric Analysis

3) Environmental Protection Agency, Water Quality Office Analytical Control Laboratory, Methods for Chemical Analysis of Water and Wastes

S5. SPECIAL STATE REQUIREMENTS

The following requirements are set forth solely pursuant to the Washington State Water Pollution Control Act, Chapter 90.48 RCW, and are not conditions or limitations under or in satisfaction of Section 402 of the Federal Water Pollution Control Act, nor conditions or limitations implementing Sections 301, 302, 306, 307 or 308 of the Federal Water Pollution Control Act.

a. Solid Waste Disposal

1. The permittee shall handle and dispose of all solid waste material in such a manner as to prevent its entry into state ground or surface waters.

2. The permittee shall not permit leachate from its solid waste material to enter state surface waters without providing all known, available and reasonab methods of treatment, nor permit such leachate to cause any adverse effect on state ground waters.

b. Oil and Hazardous Waste Materials

By October 1, 1975 the permittee shall submit to the Department of Ecology a Spill Prevention, Containment, and Counter-measure Plan. This plan shall include information and procedure relative to the prevention of spills and unplanned discharges of oil and hazardous materials such as:

1. A description of the reporting system which will be used to alert responsible facility management and appropriate legal authorities.

2. A description of preventive facilities (including overall facility plot) which prevent, contain, or treat spills and unplanned discharges and a compliance schedule to install any necessary facilities in accordance with the approved plan.

3. When oil and/or other petroleum products are removed from vessels being dismantled, this agency is to be notified. A record is to be kept of the firm or person removing the residual, the amount of residual and the date of the removal. This information shall also be reported along with the quarterly report.

GENERAL CONDITIONS

G1. All discharges and activities authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant more frequently than or at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit.

G2. Whenever a facility expansion, production increase, or process modification is anticipated which will result in a new or increased discharge, or which will cause any of the conditions of this permit to be exceeded, a new application must be submitted together with the necessary reports and engineering plans for the proposed changes. No change shall be made until plans have been approved and a new permit or permit modification has been issued.

G3. The diversion or bypass of any discharge from facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit is prohibited, except (a) where unavoidable to prevent loss of life or severe property damage, or (b) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the terms and conditions of this permit. The permittee shall immediately notify the Department in writing of each such diversion or bypass in accordance with the procedure specified in Condition G4.

G4. In the event the permittee is unable to comply with any of the conditions of this permit because of a breakdown of equipment or facilities, an accident caused by human error or negligence, or any other cause, such as an act of nature, the permittee shall:

a. Immediately take action to stop, contain, and clean up the unauthorized discharges and correct the problem.

b. Immediately notify the Department so that an investigation can be made to evaluate the impact and the corrective actions taken and determine additional action that must be taken.

c. Submit a detailed written report to the Department describing the breakdown, the actual quantity and quality of resulting waste discharges, corrective action taken, steps taken to prevent a recurrence, and any other pertinent information.

Compliance with these requirements does not relieve the permittee from responsibility to maintain continuous compliance with the conditions of this permit or the resulting liability for failure to comply.

G5. The permittee shall at all times maintain in good working order and efficiently operate all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

G6. After notice and opportunity for a hearing this permit may be modified, suspended or revoked in whole or in part during its term for cause including but not limited to the following.

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;

c. A change in the condition of the receiving waters or any other condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

G7. The permittee shall, at all reasonable times, allow authorized representatives of the Department:

a. To enter upon the permittee's premises for the purpose of inspecting and investigating conditions relating to the pollution of, or possible pollution of, any of the waters of the state, or for the purpose of investigating compliance with any of the terms of this permit:

b. To have access to and copy any records required to be kept under the terms and conditions of this permit.

c. To inspect any monitoring equipment or monitoring method required by this permit; or

d. To sample any discharge of pollutants.

G8. If a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307 (a) of the Federal Act for a toxic pollutant which is present in the discharge authorized herein and such standard or prohibition is more stringent that any limitation upon such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee shall be so notified. Section 307(a) requires that the Administrator of the Environmental Protection Agency shall promulgate effluent standards (or prohibition) for toxic pollutants which he has listed as such.

G9. Nothing in this permit shall be construed as excusing the permittee from compliance with any applicable Federal, State or local statutes, ordinances, or regulations.

WASHINGTON STATE DEPARTMENT OF ECOLOGY
POLLUTION COMPLAINT REPORT FORM

Complaint No. 0225

2. Date of Complaint 3-1-75
3. Date of Investigation _____

I. Complaint Reported By:

Name USCG Phone No. _____
Address _____
Date and time complaint first noted _____
Other information _____

II. Location:

4. Watercourse Hylebos Water Way
5. Region Northwest (✓) Southwest ( ) Eastern ( )
6. District (1) ✓ (2) [redacted]
7. County and Town Pierce, Tacoma

III. Pollutant:

8. Pollutant Source S.S Marquette 0208
9. Material [redacted] Mix special fuel oil 0204
10. Quantity 126 gal
Area or miles affected _____
(If dead or dying fish are visible, fill out Nos. IX, X and XI)

IV. Responsibility:

11. Person or entity: Name Zidell Dismantling Co 08
Address _____ Phone No. _____
Violator: Confirmed ( ) Suspected ( ) Unknown ( )

V. Cause:

12. Brief Description: hose Ruptured during 08. oil transfer.

VI. Complaint Received By:

Name _____
Time and date _____

VII. Complaint Investigated By: _____

VIII. Miscellaneous:

Were pictures taken? _____
Were samples taken? _____
Individuals and agencies notified _____
Witnesses: Name _____
Address _____
Attachments _____

$500/$250/$250

CO-055

Department of Ecology

0234

ENVIRONMENTAL COMPLAINT REPORT FORM

1. Complaint No. _____
2. Date of Complaint 3-4-75
3. Date of Investigation 3-6-75

I. COMPLAINT REPORTED BY

Name USCG Phone No. _____

Address _____

Date and time complaint first noted _____

Other information _____

II. LOCATION:

4. Watercourse ~~Home~~ Landspill
5. Region: ☐ Northwest ☒ Southwest ☐ Central ☐ Eastern
6. District: (1) 6 (2) _____
7. County and Town Pierce Tacoma
7a. Legal _____ Section _____ Township _____ Range _____

III. POLLUTANT:

0237

8. Pollutant Source Zidell Dismantling Co.
9. Material fuel oil deck
10. Quantity unknown

Area or miles affected _____

(If dead or dying fish are visible, fill out Nos. X, XI and XII.)

08

IV. RESPONSIBILITY:

11. Person or Entity: Name Zidell Dismantling Co Phone No. _____

Address _____

Violator: ☐ Confirmed ☐ Suspected ☐ Unknown

V. CAUSE:

12. Brief Description: unknown 01

WASHINGTON STATE DEPARTMENT OF ECOLOGY
POLLUTION COMPLAINT REPORT FORM

Complaint No. _____

2. Date of Complaint 3-4-75
3. Date of Investigation 3-(-7

I. Complaint Reported By:

Name _____ Phone No. _____
Address USCG
Date and time complaint first noted _____
Other information _____

II. Location:

4. Watercourse _____
5. Region Northwest ( ) Southwest (X) Eastern ( )
6. District (1) X (2) ___
7. County and Town Pierce, Tacoma

III. Pollutant:

8. Pollutant Source Zidell Dismantling Co.
9. Material fuel oil
10. Quantity unknown
Area or miles affected _____
(If dead or dying fish are visible, fill out Nos. IX, X and XI)

IV. Responsibility:

11. Person or entity: Name Zidell Dismantling Co.
Address _____ Phone No. _____
Violator: Confirmed ( ) Suspected ( ) Unknown ( )

V. Cause:

12. Brief Description: _____

VI. Complaint Received By:

Name Ted Trennier to John Burnhardt
Time and date 11:30 4-4-75

VII. Complaint Investigated By: _____

VIII. Miscellaneous:

Were pictures taken? _____
Were samples taken? _____
Individuals and agencies notified _____

Witnesses: Name _____
Address _____
Attachments _____

#LSS on RR

DEPARTMENT OF ECOLOGY

INSPECTION REPORT

To Dist III + File

Inspector Jim O

Date of Visit 8-6-75

Permit No

Name of Entity Zidell

Permit Expires

City Tacoma County Pierce

New Industry

Person Contacted Jack Zidell

Type of Facility

Receiving Water Hylebos

Type of Treatment System

Operation: Satis X Fair Unsatis

Does not comply with permit conditions

Describe: Sat down + talked over gov't + gov't controls on industry + then toured yard. All OK.

He questioned reporting spills under NPDES to DOE + yet US Coast Guard takes reporting role for Oil spills. — Safe way to call both. Some of the ships they buy have large quantities of oil on board. Now cut hole into ships hull for oil transfer — rather than use on board piping + valving — safer. Now have testing equipment for NPDES requirements

cc: but it will take awhile to learn equip. operation

DEPARTMENT OF ECOLOGY

INSPECTION REPORT

To Dist. III

Inspector Jim O.

Date of Visit 1-29-76

Permit No

Name of Entity Zidell

Permit Expires

City Tacoma County

New Industry

Person Contacted Doug, Harry

Type of Facility Ship dismalting

Receiving Water Blair.

Type of Treatment System

Operation: Satis Fair Unsatis X

Does not comply with permit conditions

Describe: Very Turbid + Oily discharge from yard area. Spillage out of tanks being cut up in yard. Trucks running through area mix mud + oils. Problem fixed today by blocking catch basins + berming yard. Asorbant placed at outfall. Company didn't know drainage went to Blair. Maybe requires separator + house keeping work.

Will write letter.

I would estimate JTU's at 300-400

c:

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

ORIGINAL TO: ...JR.....
COPIES TO: .....
.....
.....
LAB.FILES.....

OLYMPIA LABORATORY

DATA SUMMARY

Source Zidell's @ Tacoma Collected By J. Oberlander

Date Collected 1-29-76

Log Number: 76 - 0362

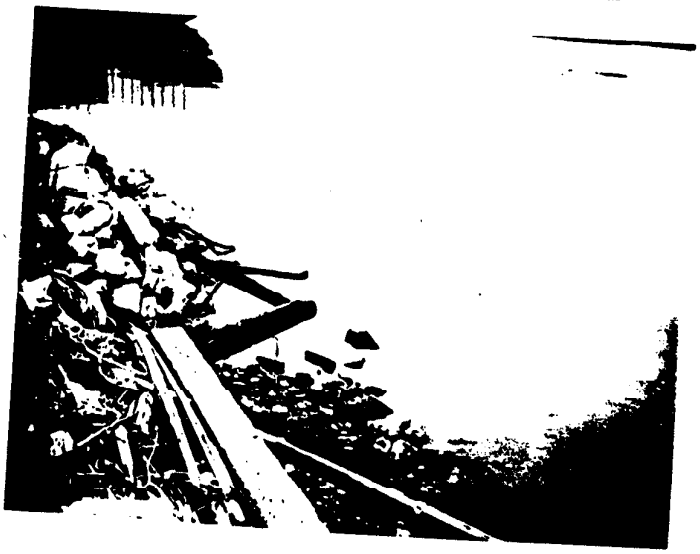
Station:	
pH	
Turbidity (NTU)	300-400 est. by Jim Oberlander
Sp. Conductivity (umhos/cm)	
COD	
BOD (5 day)	
Total Coliform (Col./100ml)	
Fecal Coliform (Col./100ml)	
NO3-N (Filtered)	
NO2-N (Filtered)	
NH3-N (Unfiltered)	
T. Kjeldahl-N (Unfiltered)	
O-PO4-P (Filtered)	
Total Phos.-P (Unfiltered)	
Total Solids	
Total Non. Vol. Solids	
Total Suspended Solids	
Total Sus. Non Vol. Solids	
Total Oils	23.

Note: All results are in PPM (mg/L) unless otherwise specified. ND is "None Detected"
"<" is "Less Than" and ">" is "Greater Than"

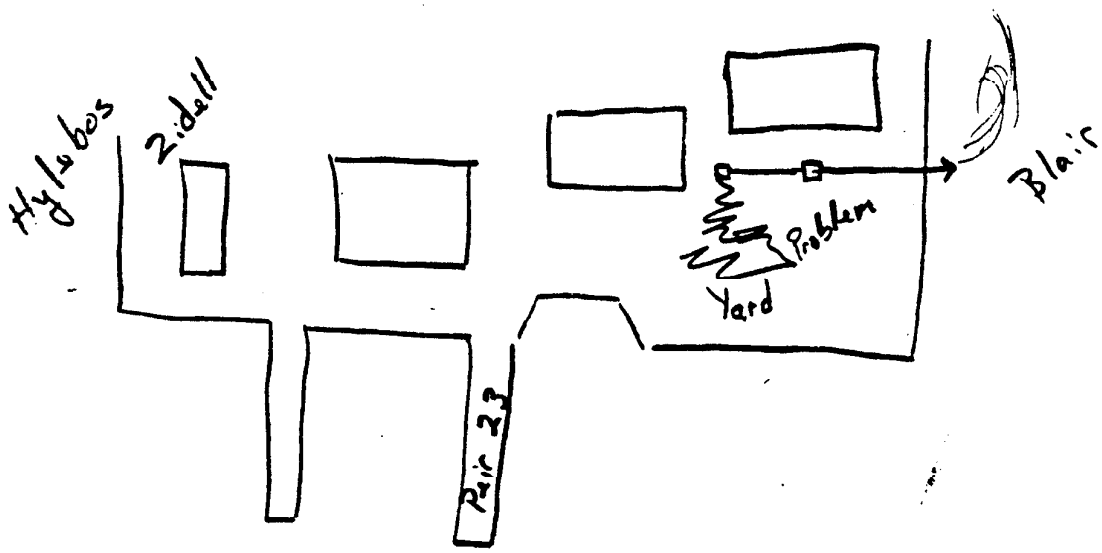
ECY 040-2-32

Summary By [illegible] Date 2-11-76

Tacoma



Blair
Waterway



State of Washington
Department of Ecology

February 19, 1976

Mr. Jack Zidell
Zidell Dismantling, Inc.
401 Alexander Avenue
TACOMA, WA 98401

Dear Jack:

On January 29, 1976, while in the Tacoma port area on routine inspections, I discovered a turbid/oily discharge to the Blair Waterway. The source was from your scrap yard via storm drainage lines.

The oil was from leakage out of hull sections. High turbidity resulted from truck traffic through muddy yard runways, and rain washing mud tracked onto asphalted roads into catch basins.

Your personnel were not aware of the yard drainage system. This information should be common knowledge to supervisors and included in your company's Spill Prevention Control Counter Measures Plan. Upon my informing your personnel of the source, they did take immediate action to correct the problem. Because of this excellent cooperation, no enforcement action from this agency will result.

However, permanent steps to resolve this problem from reoccurring must be formalized. Consideration should be given to crushed rocks in yard runways, a bermed holding area for oily hull sections, employee education, catch basin cleaning and a road cleaning program. Please report by April 1, 1976 on those steps that will or have been taken to prevent this violation of water pollution laws from reoccurring.

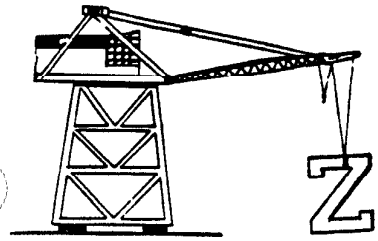
Should you have any questions, please contact me at 753-0133 in Olympia.

Sincerely,

Jim Oberlander
Environmental Quality Inspector

JO:rm

Enclosure



ZIDELL Dismantling Co.

401 ALEXANDER AVENUE March 18, 1976 TACOMA, WASHINGTON 98421

Mr. Jim Oberlander
State of Washington
Department of Ecology
Olympia, Wash. 98504

Gentlemen:

Concerning your letter of February 19, 1976 regarding the results of your routine inspection, the following action has been taken: Personnel, both worker and supervisory levels, have been educated and made aware of the problem. A determined effort has been made to clean roadways. To help in this effort, the staging areas for steel and hull sections have been moved back from roadways in an endeavor to keep undesirable material from reaching the catch basins.

We have devised and installed a filtering system within each catch basin which consists of a screen supporting Conwed Sorbent Pads to function as an additional preventative measure.

Sincerely,

ZIDELL DISMANTLING, INC.

Doug Hansch

Doug Hansch
Safety Division

DH/bd

DEPARTMENT OF ECOLOGY

INSPECTION REPORT

To Dist. III

Inspector J. mO.

Date of Visit 9-2-76

Permit No. _____

Name of Entity Zidell

Permit Expires _____

City Tacoma County _____

New Industry _____

Person Contacted Doug Hansch

Type of Facility _____

Receiving Water Bay

Type of Treatment System _____

Operation Satis _____ Fair X Unsatis _____

Does not comply with permit conditions

Describe Out of ships to dismantle. Prices to Shipping out last of steel. Begining clean up of yard. They will be going into barge building. Looking for additional property. They will use old ship yard ways.

I told Doug we need to close out or rewrite NPDES for new operation. I will set up meeting w Doug & Jack later this month.

cc

DEPARTMENT OF ECOLOGY

INSPECTION REPORT

55 RH Dk RP

To Dist. III + file

Inspector Jim C.

Date of Visit 11-4-76

Permit No.

Name of Entity Zidell

Permit Expires

City Tacoma County

New Industry

Person Contacted Mr. Zidell + Doug Hansch

Type of Facility

Receiving Water Hylebos Waterway

Type of Treatment System

Operation Satis X Fair Unsatis

Does not comply with permit conditions

Describe Company now into building self loading/unloading grain barges Constructing two at a time. May soon expand into old Star Steel Bldg. Some painting done on barges. Most of barge finish work done in Portland Yard. Scrape yard to be cleaned up soon. I suggested doing work during dry weather - they agreed. Doug will write us a letter requesting end to NPDES permit.

CC

AK-WA SHIPYARDS DOCUMENTS

FROM

ECOLOGY AND EPA FILES

WATER MANAGEMENT LABORATORIES INC.

1515 80th St. E.
Tacoma, WA 98404
531-3121

March 12, 1991

AK-WA, Inc
401 Alexander, Bldg 588
Tacoma, WA 98421
Attn: Rocky Becker, QA / Safety Director

Dear Sir:

Results of analysis of three stormwater samples taken by Terry Vernon of AK-WA and Alan Aplin of WML on 3-1-91 and received 3-1-91 at 12:40 p.m. are as follows:

Sample Location: AK-WA, Bldg 588 (see map)

SAMPLE IDENTIFICATION

	A, SE Side 10:45 a.m.	B, NE Side 10:55 a.m.	C, NW Side 11:00 a.m.
Fecal Coliform (per 100 mls)	5400	2400	4.5
Temperature (Degrees Celsius)	6	7	7
Flow Rate (g.p.m.)	0.4	0.2	0.8
pH (units)	7.4	7.0	6.7
Lead (mg/l)	0.032	0.250	0.048
Copper (mg/l)	0.4	1.0	0.5
Zinc (mg/l)	1.0	2.3	4.3
Total Suspended Solids (mg/l)	24	116	10
Chemical Oxygen Demand (mg/l)	88	70	138
Total Organic Carbon (mg/l)	19.0	10.3	26.8
Oil & Grease (mg/l)	10.9	6.5	3.6

SAMPLE IDENTIFICATION

	A, SE Side 10:45 a.m.	B, NE. Side 10:55 a.m.	C, NW Side 11:00 a.m.
Benzene (micrograms/l) *	3.4	less than 0.5	less than 0.5
Toluene (micrograms/l)	24.2	less than 0.5	less than 0.5
Xylenes ** (micrograms/l)	52.7	15.6	3.9
Acetones (micrograms/l)	less than 100	less than 100	less than 100
PCB (micrograms/l)	less than 1.0	less than 1.0	less than 1.0
Methel Ethel Ketone (micrograms/l)	less than 100	less than 100	2870
111 Trichloroethane (micrograms/l)	33.1	1.8	0.8

* a microgram per liter is the same as a part per billion

** Meta, ortho, and para xylenes are included and reported as one group

Microbiology lab numbers 89-09014 through 89-09016

Chemistry Lab number 89-07183

Samples were analyzed according to Standard Methods for the Examination of Water and Wastewater, 16th Edition, EPA, Test Methods for Evaluating Water and Wastes, SW 846, Method 8240, and Federal Register 40 CFR Part 136 "Test Procedures for the Analysis of Pollutants Under the Clean Water Act, Part VIII."

P.O. number 7011 - 001 - 26QA

Information sheets on some of the analyses performed are enclosed to help you interpret the results. These information sheets are for your use. You do not have to forward these to the regulatory agencies along with your results.

We are unable to perform tributyl tin analysis at this time. We have been unable to find a laboratory in the State of Washington that performs this analysis. This analysis is done in Victoria, Canada. If you would like us to help you find a laboratory that performs tributyltin please let us know.

Sincerely,

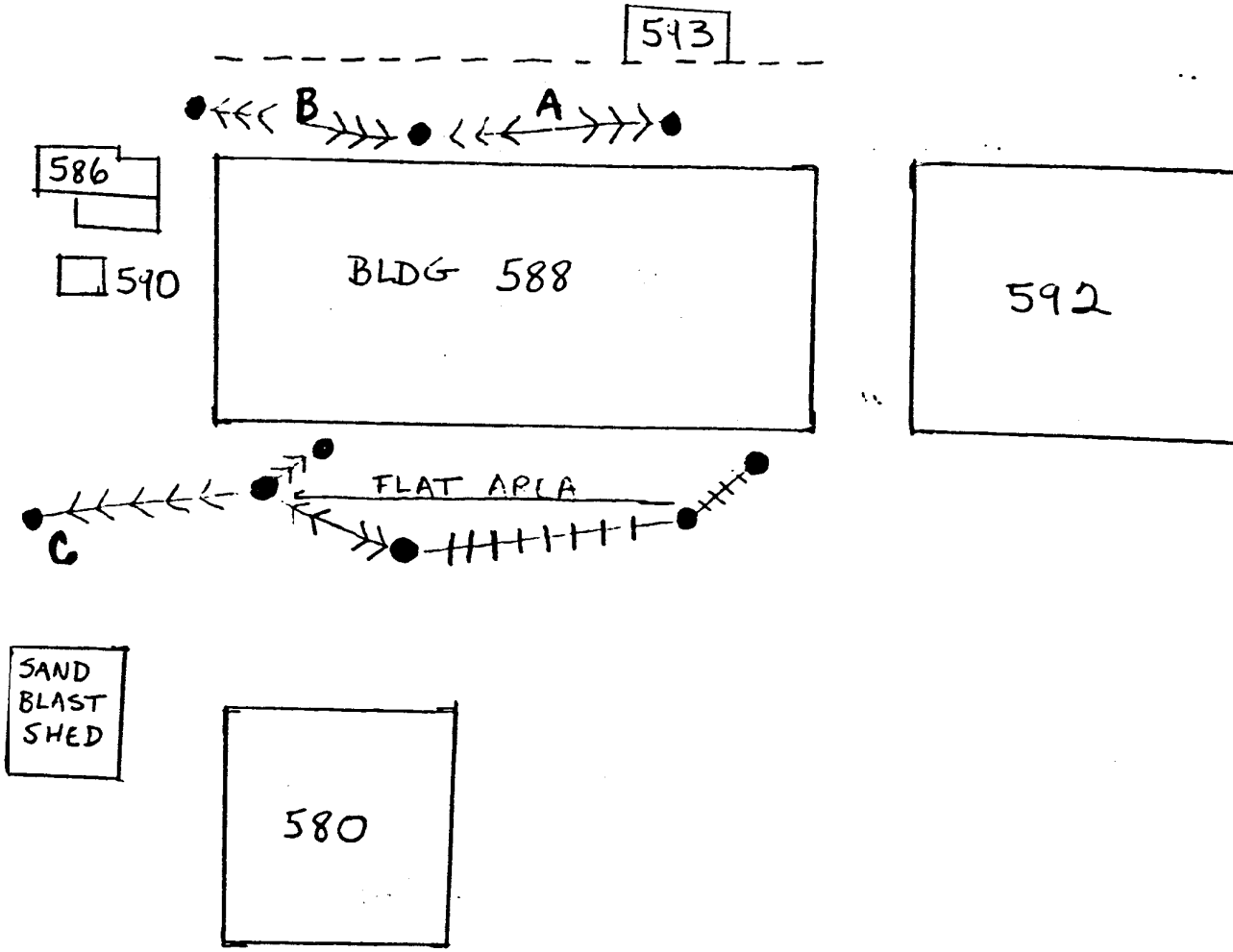
Diane DuMond
Lab Coordinator

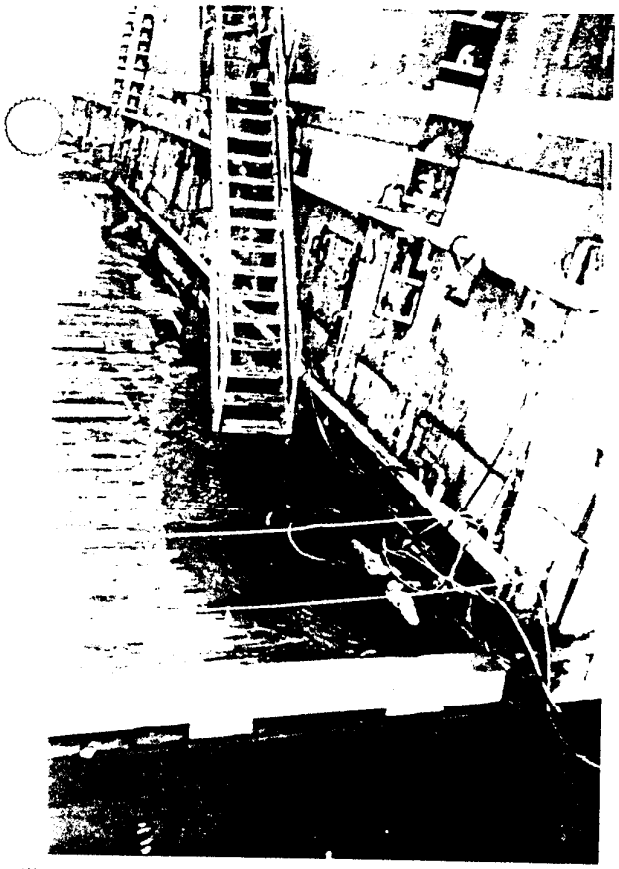
AK-WA 3-1-91

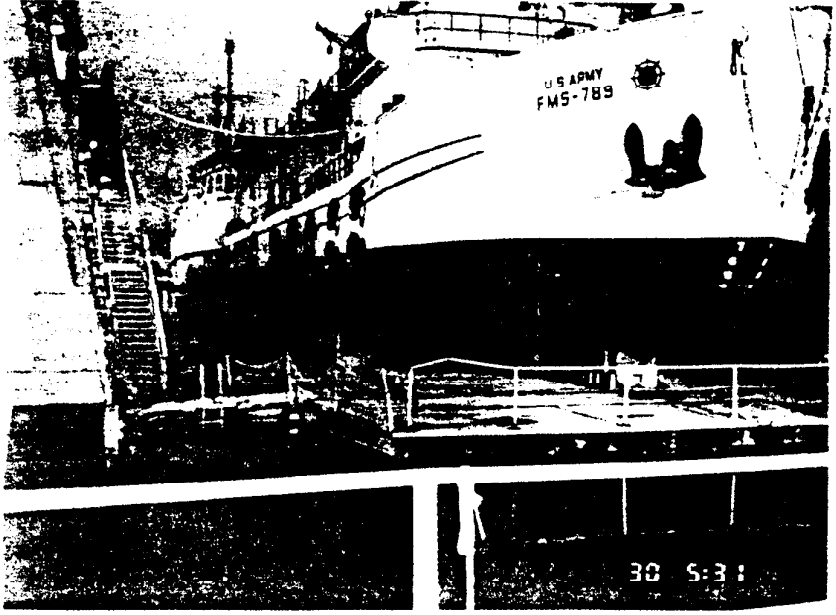
KEY

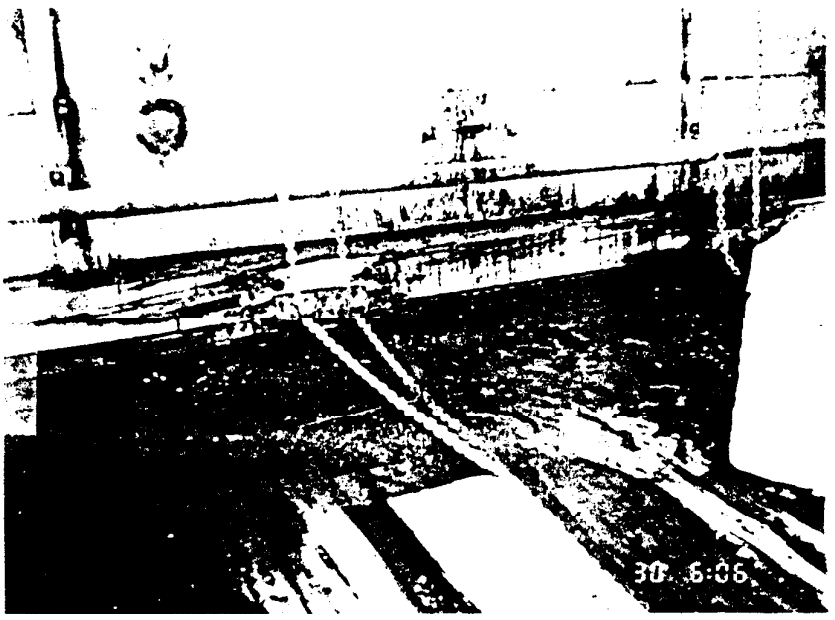
● STORM DRAIN

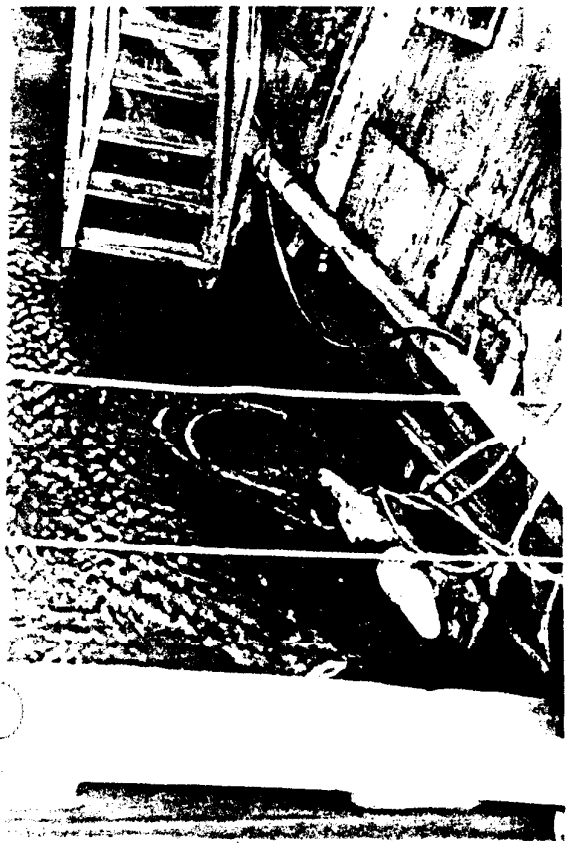
<<< DIRECTION OF STORMWATER FLOW

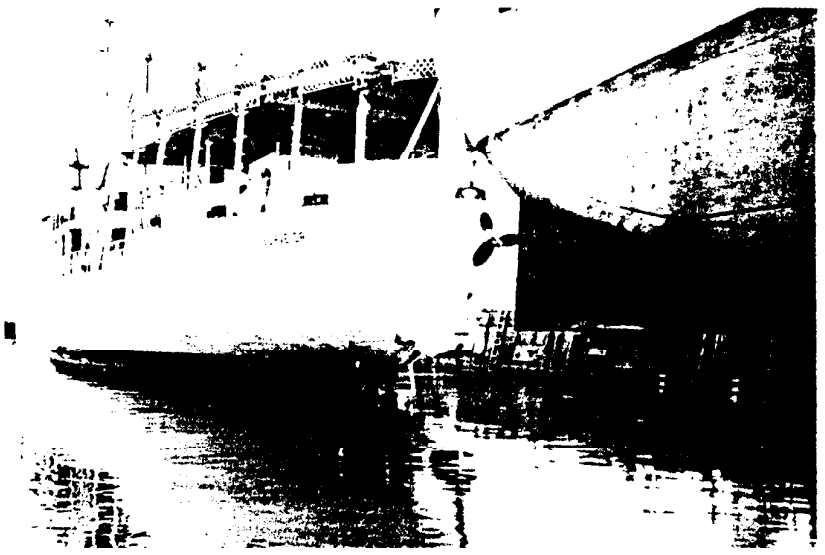





U.S ARMY
FMS-789







May 1991

FACT SHEET

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

APPLICANT:	AK-WA Incorporated
FACILITY LOCATION:	401 Alexander Avenue, Bldg #588 Tacoma, Washington 98421
PERMIT NUMBER:	WA-004014-2
ACTIVITY:	Ship Repair and Conversion
LOCATION:	Drydock - 47° 17' 05"; 122° 24' 20" Storm Drain Outfalls - 47° 17' 00"; 122° 24' 30"
RECEIVING WATER:	Hylebos Waterway, Inner Commencement Bay

PUBLIC COMMENT AND INFORMATION

AK-WA Incorporated has applied for a National Pollutant Discharge Elimination System (NPDES) Permit to discharge pollutants pursuant to the provisions of Chapter 90.48 Revised Code of Washington (RCW), as amended, and the Federal Water Pollution Control Act (Clean Water Act).

The Washington Department of Ecology (Ecology) has tentatively determined to issue a permit to AK-WA Incorporated for discharge of stormwater and drydock wastewater to Hylebos Waterway, subject to certain effluent limitations and other conditions necessary to carry out provisions of state and federal law.

Interested persons are invited to submit written comments regarding this proposed permit. Comments should be submitted within thirty (30) days of the date of issuance of the public notice for this application.

Washington Department of Ecology
Southwest Regional Office
Attention: Mr. Michael Herold
7272 Cleanwater Lane, LU-11
Olympia, Washington 98504

If the comments received indicate significant public interest in the proposed permit or if useful information could be produced thereby, the director may require that a public hearing on the draft permit be held. Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing.

The application, proposed permit, and related documents are available for review and copying between 8:30 a.m. and 4:30 p.m. weekdays at the above address. A copying machine is available for use at a nominal charge.

1. Background

AK-WA Incorporated (AK-WA) has been repairing and rebuilding vessels at its present location at the mouth of Hylebos Waterway since 1986. Zidell Marine and Tacoma Boat previously conducted similar operations on this site. The site has been used by the shipbuilding and repair

industry for over 70 years. Current property owner is the Port of Tacoma.

In a typical month, four steel-hulled vessels are repaired or converted at the shipyard. Activities include welding, cutting, machining, sandblasting, painting, carpentry, pipefitting, and electrical wiring. The AK-WA facility has not previously had an NPDES permit.

The AK-WA plant site covers approximately four acres (Figure 1). Their facility includes a wooden dry dock, which can handle vessels up to 10,000 tons. Dockside facilities allow repair of vessels up to 1,000 feet in length. Other facilities are the major plate and fabrication areas, marine construction, warehouse, paint storage and offices within Building #588, outfitting docks, grit blasting and paint spray areas, and lumber storage areas. Shops providing services at the shipyard include fabrication, paint, electric, machine, carpentry, and pipe fabrication. Repair of small vessels can be accomplished on the shoreside areas of the facility.

2. Relationship to the Commencement Bay Nearshore/Tideflats Superfund Site

The AK-WA facility is located within the boundaries of the Commencement Bay Nearshore/Tideflats (CB/NT) Superfund Site. Ecology and the Environmental Protection Agency (EPA) have completed the CB/NT remedial investigation (August 1985) and the feasibility study (February 1989). The remedial action plan for contaminated sediments and source control within the site is documented in a Record of Decision (ROD), which was signed on September 30, 1989.

The AK-WA facility is located on the southwest bank of Hylebos Waterway, which is located within the boundaries of the Mouth of the Hylebos Waterway Problem Area in the CB/NT site. The priority chemicals for this problem area include pollutants such as lead, copper, zinc and chlorinated hydrocarbons that have been detected in stormwater from the AK-WA facility and in hydroblasting discharges from other shipyards. .

Under this NPDES permit, BMPs are required first to control discharges of priority chemicals in stormwater from this facility, and then monitoring will be conducted to ensure the effectiveness of BMPs. If monitoring indicates that pollutants in stormwater are not controlled by the measures, waste treatment systems such as settlement basins, sand filters, and/or oil/water separators shall be installed. This approach is consistent with the ROD, which states that implementation of BMPs is the main form of remedial action at shipyards.

Collection and treatment methods to reduce metals and total solids loading in hydroblasting wastewater have been investigated and found to be feasible at other drydock facilities. Therefore, a compliance schedule to explore and implement adequate treatment of hydroblasting wastewater is included in this permit under special conditions.

The issuance of this NPDES permit provides a monitoring mechanism in order to determine if these actions are sufficient to prevent recontamination of sediments in Hylebos Waterway from AK-WA discharges.

3. Description of Discharges

A. Stormwater

The entire AK-WA site is paved, and precipitation that collects as surface water on-site is collected in three storm drain systems. Those systems discharge to Hylebos Waterway via Outfalls 002, 003,

and 004 (Figure 1). The stormwater discharge becomes contaminated due to contact with pollutants in materials that have been deposited on the ground at the facility. The types of materials that may accumulate at shipyards include spent abrasive blasting grit; fresh anti-foulant and anti-corrosive paint overspray; various cleaners, solvents, and anti-corrosive compounds; paint chips; scrap metal; welding rods; wood; plastic; and miscellaneous solid waste (e.g., paper, glass, municipal refuse). Air compressors and heavy equipment are sources of oil to the systems.

Stormwater system 002 services a small area of the shipyard outside the main office. The system 002 drainage basin includes the current hazardous waste containment area. The system is approximately 50 ft in length and has one catch basin. Outfall 002 is exposed below Pier 25 at low tide and discharges to the waterway.

Stormwater system 003 serves the area near the machine shop. The system is approximately 125 ft in length with two catch basins. Outfall 003 is also exposed at low tide and discharges beneath Pier 25 into the waterway.

The drainage basin for stormwater system 004 includes areas of the shipyard near the fabrication areas, paint shop and spray building, sand blast shed and shoreside ship repair area. The system is approximately 350 ft in length with six catch basins. Outfall 004 is exposed at low tide and discharges to Commencement Bay under Pier 24.

Stormwater samples that were collected at the shipyard in March 1991 were found to contain metals, volatile organic compounds, and oil and grease.

Copper and zinc concentrations found in effluent from each of the three storm drain systems exceeded marine acute and chronic water quality criteria. A single concentration of lead exceeded the marine acute water quality criteria in stormwater system 003. Zinc and copper are common components of marine paints.

The volatile organic compounds, xylene and methyl ethyl ketone (MEK), were found in effluent from system 004 at AK-WA. Xylene is a common component in paints, varnishes, and sealants, and MEK is a solvent commonly used to remove paint. Xylene and MEK have both been identified as components in waste thinner that has been used at AK-WA.

Benzene, toluene, xylene and trichloroethane were found in system 002. System 002 receives spillage from the handling of waste solvents at a solvent reclamation still, as well as spillage or runoff from the hazardous waste containment area.

Data collected during the stormwater characterization study at AK-WA are summarized below:

Chemical Concentrations (mg/L metals; ug/L organic compounds)

	Outfall Systems			Marine Water Quality Criteria	
	002	003	004	Acute	Chronic
Copper	0.4	1.0	0.5	0.0029	0.0029
Lead	0.032	0.250	0.048	0.14	0.0056
Zinc	1.0	2.3	4.3	0.095	0.086
Benzene	3.4	<0.5	<0.5	NA	NA
Toluene	24.2	<0.5	<0.5	NA	NA
MEK	<100	<100	2870	NA	NA
Xylenes	52.7	15.6	3.9	NA	NA
Trichlor-oethane	33.1	1.8	0.8	NA	NA

B. Drydock Discharges, Outfall 001

Vessels are repaired in the drydock. The wooden two-part drydock has external dimensions of 117 ft wide, 493 ft long, and 14 ft high. The drydock is cleaned of spent grit and materials to the maximum extent practicable prior to flooding of the drydock to float the repaired vessel. This operation is termed "undocking."

The weight of water pumped to ballast tanks to sink the drydock and float the vessel approximately equals the weight of the vessel to be undocked. This water represents the volume of water pumped out of the ballast tanks to initially raise the vessel and drydock at the time of "docking." There are no additives to ballast water, no contact with process wastes, and a relatively short time period of holding in ballast tanks. Ambient water is moved through the ballast tanks and therefore the quality of pumped water, though large in volume, is not a concern for the discharge permit.

The undocking of a vessel does involve dispersion of any wastes and materials remaining on the drydock deck. Material can be removed to minimize such dispersion. The drydock has a 12 inch slope downward from the longitudinal center towards the outside wing walls. This configuration results in some wastes being conveyed by water movement on the deck to the outside edges where small retaining dams restrict further dispersal of solids off the deck and into the receiving water.

Discharges from the drydock also include hydroblasting wastewater. Hydroblasting using heated domestic water is performed to clean hulls of organic debris and encrusting organisms prior to initiation of repair work on the hull. Some paint may be removed from the hull. Volumes and quality of the wastewater vary according to the size and degree of fouling on each hull. Investigation of hydroblasting wastes during the preparation of NPDES Permit # WA-003093-7 for Duwamish Shipyard indicated that toxic metals in toxic amounts may be generated during hydroblasting operations, resulting in violations of the marine acute toxicity criteria if applied at point of discharge. Turbidity may also be affected.

C. Bilge, Sanitary and Solid Wastes

The shipyard infrequently pumps and disposes of bilge, ballast, or gray waters from vessels. Any bilge water from pier-side vessels

is removed by contract tank cleaners at dockside. Wastes are removed off site by the contractors. Air pressure rather than water is used to test repairs to vessel tanks.

Sanitary wastewater from this facility is discharged to the City of Tacoma wastewater treatment plant.

Solid waste generated at the site includes blasting grit. This material is currently transported off-site for use in cement-making. Scrap metal to be recycled is stored on-site in dumpsters. Sludges from parts cleaning tanks are removed on a regular basis.
A solvent reclaiming still is used to reclaim solvents, mainly MEK. Other solvents are stored in drums until transport off-site by a solvent recycler. Waste paint residues are allowed to dry in buckets, and are then disposed of as a solid waste.

4. Receiving Water

Stormwater, undocking and hydroblasting runoff from the AK-WA facility is discharged to Hylebos Waterway-Inner Commencement Bay. Hylebos Waterway and Inner Commencement Bay are classified by the Washington State Water Quality Standards as Class B marine waters.

The applicable receiving water quality standards are those adopted by Ecology and approved by the U.S. Environmental Protection Agency (EPA) Regional Administrator pursuant to Section 303 of the Clean Water Act. The applicable standards are contained in Chapter 173-201-045 WAC.

General water quality parameters that could be affected by the stormwater and other AK-WA discharges include pH, turbidity, and aesthetic values from sediment, paints and oil and grease contamination.

Per Chapter 173-201-047 WAC, toxic substances shall not be introduced above natural background levels in waters of the state which may adversely affect characteristic water uses, cause acute or chronic conditions to the aquatic biota, or adversely affect public health, as determined by the Department.

The applicable water quality standards for toxic substances per 173-201-047 WAC should be maintained by the adherence to the BMP's listed in the permit and implementation of adequate treatment of hydroblasting wastewater. In the event that it is determined that water quality standards are being violated or the potential for violation becomes evident, then Ecology will impose new or additional discharge limits for the particular parameter or an indicator. The receiving water monitoring coinciding with a stormwater sampling event, drydock sampling results, and waterway monitoring by Ecology or other agencies will be adequate to detect possible Water Quality Standard violations.

5. Flow Rates

Discharge to Hylebos Waterway is the result of precipitation runoff (stormwater) from the entire 4 acre AK-WA facility. Flow volumes vary depending on storm events and precipitation. During a 10-year rainfall event, the peak flow rate was estimated to be approximately 6.8 cubic feet per second, using the Rational Method and the statistical 10-year rainfall intensity of 1.9 in/hr for Tacoma. The total daily stormwater volume for the 10-year event was estimated to be approximately 40,500 cubic feet (303,000 gallons). In Tacoma, the 10-year storm event produces approximately 3.1 inches of rainfall over a 24-hour period.

Total yearly stormwater runoff from the AK-WA facility has been estimated at 1,670,000 gallons per year.

As a requirement for this permit, the Permittee is required to estimate the annual quantity of stormwater discharged via each outfall at the facility.

The total yearly hydroblasting wastewater volume has been estimated at 140,000 gallons per year. Hydroblasting wastewater flows will be addressed as a part of an engineering report specified in the compliance schedule for implementation of adequate treatment.

6. Basis of Limitations

The Clean Water Act requires that Best Available Pollutant Control Technology (BAT) or Best Conventional Pollutant Control Technology (BCT) be in effect no later than July 1, 1984 (40 CFR Part 125.3). Permit limitations must either reflect appropriate promulgated limitations or, when such regulations are not yet available, be based on Best Professional Judgment (BPJ). Pursuant to Section 402(a)(1) of the Clean Water Act, BPJ is used to determine BAT/BCT. As there are no promulgated effluent limitations guidelines or BAT/BCT regulations establishing limits for the shipbuilding and repair point source category, BPJ was used to determine the BAT/BCT limits and requirements of the permit.

All known, available, and reasonable methods of treatment (AKART) to control contaminants in the applicant's stormwater runoff will be used. For stormwater, AKART is defined by implementation of Best Management Practices (BMPs), followed by water quality monitoring to ensure the effectiveness in controlling pollutant discharges and if BMPS are not effective in controlling pollutants then the application of effective treatment technologies.

Hydroblasting discharges which result in violations of water quality standards are prohibited by the terms of the permit. All known, available and reasonable methods of treatment (AKART) have not yet been established conclusively for hydroblasting discharges from drydocks. The permittee will be placed on a compliance schedule to ascertain and implement AKART for the hydroblasting operation at AK-WA. The implementation of such methods will be adequate, along with BMPs and other interim measures, to prevent violations of water quality standards. Predicted hydroblasting wastewater flows of 12,000 gallons per month may be successfully dispersed in the average current of 11cm/second present at the mouth of Hylebos waterway when discharge rates of treated wastewaters are controlled.

Priority pollutant and other metals, volatile organic compounds, and oil and grease are potentially discharged by the AK-WA facility and are to be controlled by the effluent limitations, monitoring requirements, and Best Management Practices established by this permit.

Included herein is the "Rationale for the Selection of Pollutant Parameters" section of the Draft Development Document for Proposed Effluent Limitations Guidelines and Standards for the Shipbuilding and Repair Point Source Category (EPA 440/1-79/76-b) which identifies the following pollutant parameters as those potentially released by shipyard activities and which have the potential to be discharged to receiving waters.

A. Conventional Parameters

Effluent limits were established for oil and grease in discharges from Outfalls 002, 003, and 004 and the drydock undocking discharges. BPJ was used to determine BCT for the stormwater discharges. Oily stormwater runoff or wastewater can be treated with an oil-water separator, or pass through oil and sand collection tanks. These treatment technologies are capable of reducing the oil and grease levels to 10 mg/L. The hydroblasting and drydock discharge limits are based on the ability to minimize oil, paint, and sediment discharges through BMP's.

Effluent limits were established for total suspended solids (TSS) in discharges from Outfalls 001, 002, 003, and 004, based on the AKART determination established in the previously issued shipyard wastewater discharge permit number WA-003093-7. The drydock undocking discharge limit for TSS is based on the ability of the specified BMP's to reduce contaminants on the drydock prior to undocking. The Permittee is also required to monitor pH and flow in the discharges during sampling events.

B. Priority Pollutant and Other Chemicals

The EPA Development Document for Shipbuilding and Repair recognizes the high potential for metals to be found in shipyard discharges, but study results indicate that such discharges may not be amenable to quantitative measurements for establishing national effluent limitations (pp. 70-77). In lieu of national effluent limitations, the EPA study results suggested that pollutant discharges shall be controlled primarily by BMPs. However, the EPA study did not address whether BMPs would be effective in ensuring that discharges did not violate state water quality standards in the receiving environment.

As one tool to indicate whether the BMPs and BMP plan requirements are being followed and are effective at the shipyard, chemical monitoring requirements are included in the permit. Chemical monitoring results will be used to assess concentrations of metal and volatile organic compounds being discharged via stormwater runoff, hydroblasting wastewater and during undocking and to evaluate whether water quality standards are being met at the point of discharge.

Effluent limits for hydroblasting discharges have been established based on the water quality criteria of a maximum 2.9 ug of dissolved copper per liter of marine water to prevent acute toxicity to bivalve embryos. Due to federal regulations and the potential for dissolution of metals from particulates in Hylebos Water, total recoverable methods of analysis and limits are established. The functional limit for metals is the Contract Required Detection Limit (CRDL) established by EPA whenever the water quality criteria is lower than the CRDL. Other metal limits are also based on the Water quality Criteria of Chapter 173-201-047 WAC. A compliance schedule for achieving the effluent limits, satisfying Water Quality Standards and determining AKART is included in the permit.

Monitoring requirements have not been established for semivolatile organic compounds and PCBs because those compounds are not probable components of AK-WA's wastestream, they were not identified as potential pollutants of concern in the EPA

Development Document, and PCBs were not detected in stormwater data submitted by AK-WA.

The Permittee shall submit a new application or supplement to the previous application where facility or process modifications or changes result in new or substantially increased discharges of pollutants or a change in the nature of the discharge of the pollutants.

7. Monitoring of Drydock Discharges

Discharges from the drydock will be monitored during each day of undocking for the first three years of the permit by compositing three grab samples from the down current side of the drydock during the undocking procedure. The sample containers may be secured by some device to the deck or wall of the drydock so that each sample container is filled as the deck submerges. The individual samples may then be retrieved for compositing. An additional sample must be gathered to satisfy the protocol for Oil and Grease testing. Quantifying of metals will be performed for both the total recoverable and the dissolved phases. This will enable Ecology to establish adequate permit limits for the undocking procedure and to verify that BMPs are protective of the water quality standards. Monitoring may be modified during the third year of the permit cycle.

Hydroblasting discharges from the drydock must be monitored weekly whenever hydroblasting (or hull washing which generates a wastestream off the drydock) is performed. Grab samples will be composited to represent the average discharge from the hydroblasting being conducted on the particular hull chosen for the weekly monitoring. Total suspended solids and total recoverable copper, lead and zinc will be determined.

These parameters will be adequate to enable AK-WA to evaluate alternative methods of treatment or prevention of hydroblasting discharges. The compliance schedule to implement all known, available and reasonable methods of treatment prior to discharge (AKART) specifies that an engineering report be submitted within six months after issuance of the permit. Adequate data should be generated to meet this target.

8. Monitoring of Stormwater

Stormwater in each system must be monitored monthly for the first six months of the permit by taking composite stormwater samples either at each outfall or at the catch basin nearest each outfall. Sampling is required in each system to characterize stormwater discharge. All such samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall in 24-hr period) storm event. The first flush criteria are established in order to allow potential pollutants to accumulate prior to the flushing that occurs when stormwater mobilizes and transports any particulate and liquid material through the stormdrain system. The Permittee shall make all reasonable efforts to sample the first flush of suitable rain events. The composite sample shall either be flow-weighted or time-weighted. Composite samples shall be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken within each period of discharge, with each aliquot being separated by a minimum period of fifteen minutes. A single grab per event is required for volatile organic compound analyses. Monthly sampling will not be required if there are no measurable rainfalls, but the stormwater sampling schedule shall be adjusted, such that data from the first six months with measurable rain events that meet the first flush criteria

are collected and submitted by the Permittee. At this level of monitoring, sufficient data will be obtained to adequately assess discharge characteristics.

After the sixth month of monitoring data is submitted, Ecology will review the monitoring results. If metal concentrations in the stormwater discharge exceed amounts specified in Chapter 173-201 WAC, which follows the EPA Quality Criteria for Water of 1986, or if volatile organic compounds are detected in toxic amounts in the stormwater, the Permittee must continue monthly monitoring of the stormwater and submit an engineering report to Ecology discussing alternative methods for treatment of the stormwater (per Chapter 173-240 WAC). It is expected that the discharge of solvents shall be controlled by adherence to the BMPs of the permit. There are no known sources of solvents on-site that could not be controlled by BMPs. For example, because the site is paved, there are no known portions of the property where soils (which could be possibly contaminated with solvents) could be discharged via stormwater runoff to the storm drain system. Also, sediments in the storm drain lines should be removed prior to the effluent sampling event, which would eliminate historical catch basin sediments as a potential solvent source.

At this time, Ecology will not consider a dilution zone at the storm drain outfalls because, during low tides, the stormwater effluent discharges at end-of-pipe without the benefit of a diffuser directly into the intertidal area, which could impact the health of marine organisms.

If in the future, Ecology's guidelines or policy are changed to allow a dilution zone, effluent limits for priority pollutant chemicals may be added to the permit following receipt and review of treatability, mixing zone, diffuser options, and receiving environment studies.

If metals or volatile organic compounds are not discharged in toxic amounts, upon notification from Ecology, the Permittee will only be required to monitor for these parameters in stormwater effluent four times/year (i.e., during the first flush of measurable rain events in Fall, Winter, Spring, and Summer). This quarterly chemical monitoring is required as one tool to indicate whether the BMPs and BMP plan requirements continue to be followed and are effective.

It is expected that the effluent permit limits shall be protective of human health and the environment. New information regarding effects on human health or the environment may result in reopening of this permit.

9. Receiving Water Monitoring

Coinciding with the second year of the stormwater effluent sampling event, receiving water sampling shall be conducted. The Permittee is directed to collect receiving water samples at an incoming or slack tide shoreward of the drydock and near the terminus of each stormwater outfall, and the samples shall be analyzed for priority pollutant metals and volatile organic compounds. A written report including the analytical results shall be submitted to the Department within 90 days after sampling occurs.

10. Toxicity Monitoring

Toxicity testing (biomonitoring) of the effluent is required by the 1989 Puget Sound Water Quality Management Plan. The Permittee shall conduct 48-hour acute toxicity testing using an 80% concentration of the stormwater effluent at a frequency of four times per year for the first

year of the permit (Fall, Winter, Spring, and Summer) and once every year in the Spring thereafter for the duration of the permit. Biomonitoring is required in each storm drain system. For the first four test periods, two species tests are required. Those species are the fathead minnow (*Pimephales promelas*) and a water flea (*Daphnia pulex*). After the first four test periods, only the most sensitive species is required to be tested for the remainder of the permit term. Acute toxicity testing results will be used from both the water quality-based and technology-based standpoint to evaluate the need for limits, particularly for those compounds for which no water quality standards exist. Because the discharge is not continuous (i.e., discharge occurs only as a result of precipitation), chronic toxicity monitoring is not required at this time.

Effluent samples collected for the acute toxicity testing and the chemical (i.e., metals, volatile organic compounds) monitoring samples shall be collected on split samples rather than simultaneous samples of effluent. The split samples shall be composite samples that are collected over the first two hours of a first flush rain event. As part of the normal effluent sampling schedule, conventional parameters (i.e., pH, oil and grease) shall be measured at the time of toxicity sampling.

11. Sediment Monitoring

Within 18 months of the issue date of this permit, sediment monitoring shall be conducted in accordance with the Sediment Quality Standards, Chapter 173-204 WAC. The Permittee is directed to prepare a site-specific study plan addressing characterization of sediment in the vicinity of the stormwater outfalls. The plan shall include a minimum of one subtidal marine sediment core (0-90 cm) that shall be located immediately offshore of each Outfall, and a bioassay of surface (0-2 cm) sediments using *Rhepoxynius abronius*. The chemical analysis will include analyses for: priority pollutant metals, certain semivolatile organic compounds, certain volatile organic compounds, total organic carbon, total solids, and grain size. Sampling and analysis shall follow the EPA Puget Sound Estuary Program protocols and procedures described in the Appendix A of the Integrated Action Plan for the Commencement Bay Nearshore Tideflats Superfund site.

12. Best Management Practices Plan and Requirements

The shipbuilding and repair industry is such that using numerical effluent limitations as the sole pollutant control method is impractical and ineffectual as they are difficult to apply in a manner that can be monitored consistently. Therefore, a BPJ determination has been made for the control of effluent discharges of this facility to achieve BCT and BAT through the use of Best Management Practices (BMPs) as the primary control technology, pursuant to 40 CFR Part 125 (K) and the NPDES Best Management Practices Guidance Document of August 1980. This determination incorporates the recommended BMPs set forth in the Draft Development Document for Proposed Effluent Limitations for the Shipbuilding and Repair Point Source Category, EPA 440/1-79/b, December 1979. The BMPs are used as a BPJ tool to control effluent discharge pursuant to Sections 304 and 402 of the Federal Clean Water Act.

A. BMP Plan

A BMP Plan is required of the Permittee to establish measures and practices to control discharges. The BMP Plan is intended to provide a basis for the facility to set up BMP practices in conjunction with the specific BMPs of the permit that ensure the facilities operation prevents or minimizes the discharge of

pollutants. The BMP plan shall be submitted within 3 months of permit issuance to Ecology for review and approval.

A specific requirement of the plan is to record the method of blasting and the frequency of hydroblasting to establish a record of those operations that may contribute to discharge and BMP incidents*, and which may not be controlled by the specific BMPs of the permit. The BMP Plan requirements to record this information and the additional monitoring requirements of this permit will establish a database of priority pollutant and other metals actually discharged. The results of those practices will be reviewed when Ecology inspections are performed.

*A "BMP Incident" is defined as "a discharge of significant amount of a toxic pollutant or hazardous substance from the ancillary sources subject to BMP regulations."

B. Best Management Practices Requirements

BMPs were developed to achieve pollution control through careful management of the product streams and wastestreams. A BPJ determination was made that the BMPs of the Shipbuilding and Repair Draft Development Document are appropriate control measures for the discharges of this facility. The BMPs of this permit are procedures to prevent and minimize the potential for the release of pollutants to the receiving water. Current feasible pollution controls generally consist of prompt clean up of pollutants, segregation of pollutants, and temporary barriers of plywood sheeting, tarpaulins, and plastic to prevent or minimize the transport of paint, paint overspray, abrasive blasting grit, dust, and detritus to waters of the state.

The following are the BMPs incorporated into the permit. Which, when followed by the Permittee, should ensure that solids, oil and grease, and other potential pollutants will not enter the receiving water:

BMP A. Control of Large Solid Materials

BMP B. Control and Clean-up of Paint Dust and Abrasive Blasting Debris

BMP C. Oil, Grease, and Fuel Spills, Prevention and Containment

BMP D. Paint and Solvent Use and Containment

BMP E. Contact of Water and Debris

BMP F. Maintenance of Hoses and Piping

BMP G. Bilge and Ballast Water

BMP H. Chemical Storage

BMP I. Recycling of Spilled Chemicals and Rinse water

13. Handling of Solid Waste

Spent sandblasting debris and spent grit is to be stored and disposed of in such a way as to prevent its entry or the entry of leachate into receiving waters. All solid waste material shall be handled in such a manner as to prevent its entry into surface waters, and shall be disposed of in an approved manner. A solid waste control plan shall be submitted to the Department within 12 months of permit issuance.

14. Permit Reopener

A permit reopener statement has been included in this permit. If the results of any of the studies discussed above indicate that further action (e.g., additional monitoring or stormwater treatment) is necessary, the permit reopener will allow Ecology to modify existing permit conditions and limitations or establish new conditions or limitations on the basis of monitoring results or other causes consistent with state and federal regulations.

15. Permit Duration

This permit is issued for a period of five (5) years.

16. Special Conditions

A. The permit prohibits the discharge of sanitary wastes and wastewater from steamcleaning and acid or caustic dip tank operations to waters of the U.S.

B. The permit requires that owners of vessels in drydock or under repair pier-side are notified of the regulations prohibiting discharge of untreated sewage directly into the waterway. Any ballast water containing solvents, detergents, fuel, or other additives will not be discharged to surface water, unless a state water quality variance has been previously granted by Ecology for each instance.

C. Within 30 days of permit issuance, the Permittee is required to submit a plan to remove all sediments and sandblasting grit from storm drain catch basins and lines. The plan must include a description of measures that will be taken to ensure that storm drain sediments are not discharged to the waterway during those operations. Within 15 days of plan approval, the Permittee must complete the removal of all sediments and grit from the storm drain system. The Permittee must show that sediments and grit were adequately characterized prior to disposal. A final report must be submitted to the Department within 30 days after the removal is complete.

This permit also requires the inspection of storm drain lines at a minimum of once per month, and solids must be removed as necessary to ensure the interception and retention of solids entering the drainage system. A storm drain log book must be maintained to record all information pertaining to the storm drain inspection program and sediment removal efforts. If BMPs are not completely successful in eliminating blasting grit discharge to the storm drain systems, the Permittee must submit a plan by the sixth month of the permit proposing technology (e.g., sedimentation tanks) for eliminating blasting grit discharge to the waterway.

D. On a biennial basis, the Permittee shall provide to the Department an estimate of stormwater flow from each storm drain system. A site inspection shall be conducted annually by the Permittee to verify the accuracy of the description of potential pollutant sources, to update or otherwise modify the drainage map to reflect current conditions, and to verify the adequacy of controls to reduce pollutants in stormwater discharges associated with industrial activities. The Permittee shall provide Ecology with all updated information.

E. The Permittee is required to submit, on an annual basis, a list of significant spills and leaks of toxic or hazardous pollutants that occurred at the facility after the effective date of this permit. Such a list should include a description of materials released, an estimate of the volume of the release, the location of the

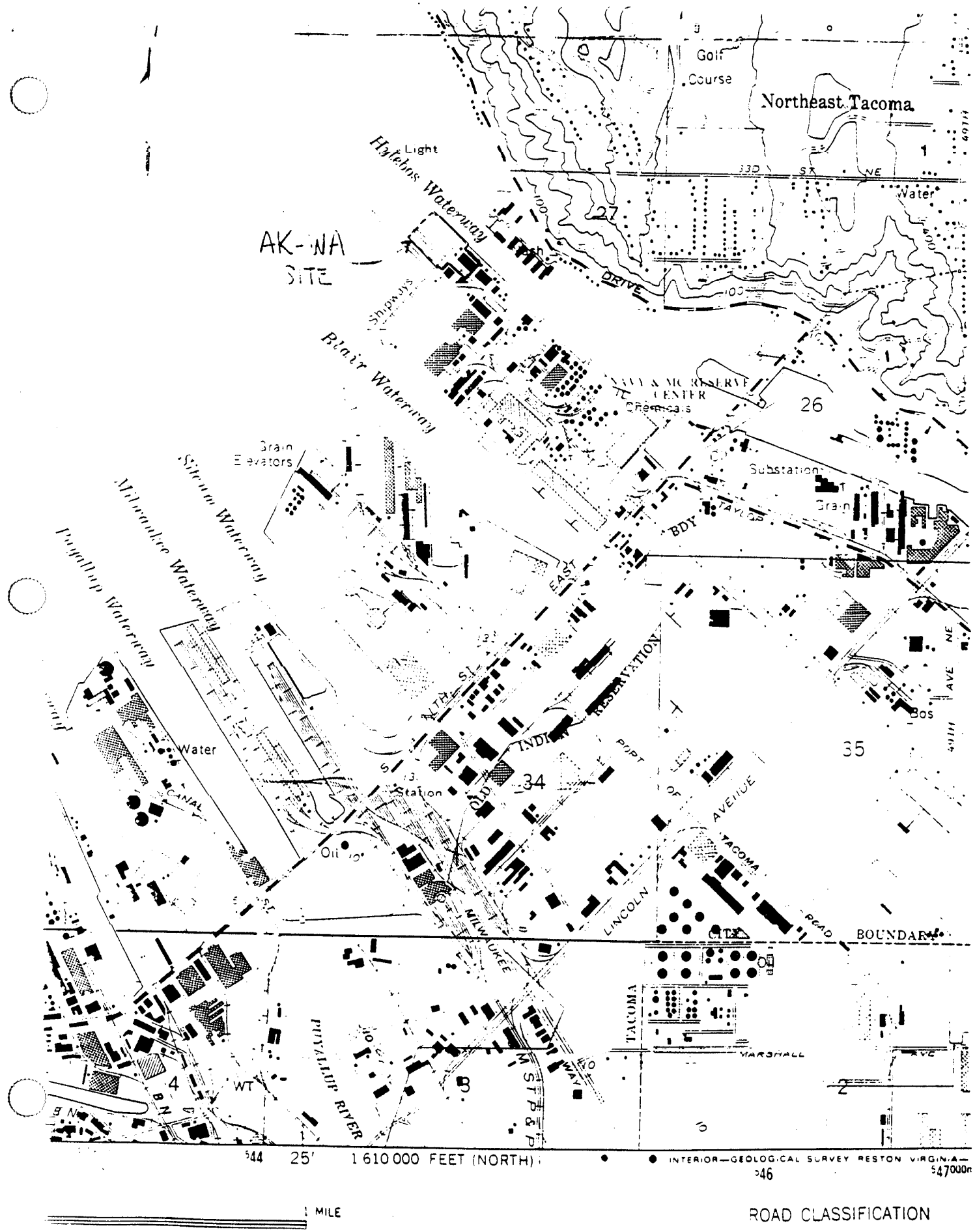
release, a description of cleanup measures taken, and measures taken to prevent recurrence.

F. If required by Ecology, the Permittee shall submit an engineering report, in conformance with WAC 173-240, which will outline options for meeting stormwater effluent permit limits.

G. The permittee will be required to submit an engineering report in conformance with WAC 173-240 which addresses collection and treatment of hydroblasting wastewater. Construction or implementation of the approved option to meet permit limits should occur within two years.

17. Summary of Compliance Dates

A summary of compliance dates for reports is provided in the permit.


AK-NA
SITE
Northeast Tacoma
Golf Course
Light
Hylebos Waterway
Blair Waterway
Sitcum Waterway
Milwaukee Waterway
Puyallup Waterway
Grain Elevators
Chemicals
Substation
Water
Station
Oil
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INDIAN RESERVATION
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PORT OF TACOMA ROAD
LINCOLN AVENUE
MILWAUKEE
TACOMA
MARSHALL
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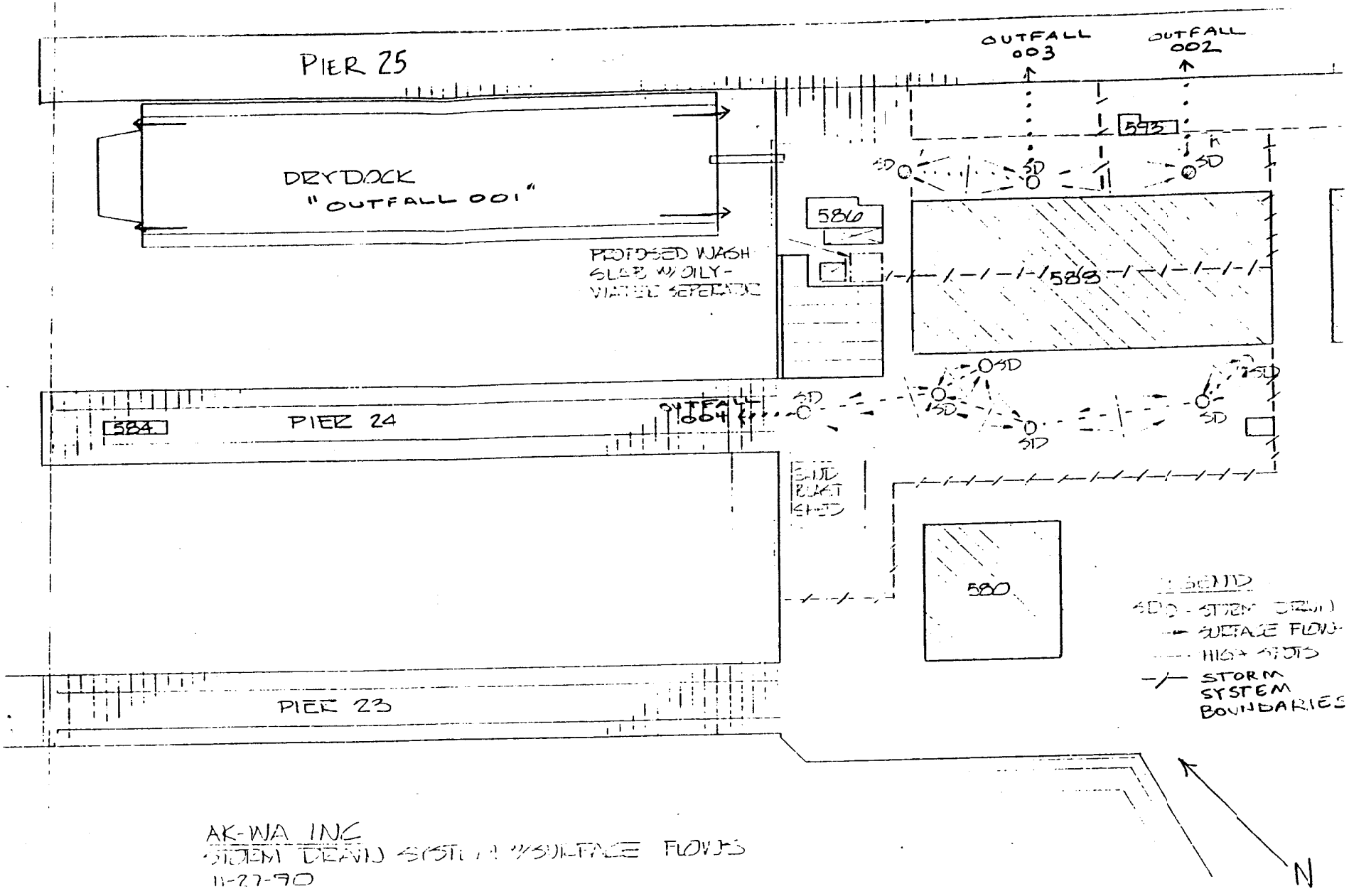
ROAD CLASSIFICATION



AK-WA INC
STORM DRAIN SYSTEM W/SURFACE FLOWS
11-27-90

S W R O
DEPARTMENT OF ECOLOGY ENVIRONMENTAL REPORT

RECORDER: BRETT MANNING WEATHER: TIDE: ID#: 53028

DATE: 05/15/91 TIME: 07:55:00 COUNTY: PIERCE WATERWAY: HYLEBOS WATERWAY

REPORTED BY: ROCKY BECKER
BUS NAME: AK-WA SHIPYARD
ADDRESS: 401 ALEXANDER, BLDG 588
CITY: TACOMA STATE: WA
ZIP: 98421 HOME PHONE:
BUS PHONE: (206)-272-0108
ANONYMOUS: BEST TIME TO CALL:

LOC DESC:

CITY: TACOMA

ALLEGED VIOLATOR: AK-WA SHIPYARD
ADDRESS: 401 ALEXANDER, BLDG 588
CITY: TACOMA STATE: WA EXT:
ZIP: 98421 PHONE: (206)-272-0108
CONTACT: ROCKY BECKER PHONE: (206)-272-0108

copy in site file

MEDIUM: SURFACE WATER MAT TYPE: DIESEL

MATERIAL: OIL/PETROLEUM SOURCE: VESSEL/SHIP INCIDENT

QUANTITY: < 50 GAL ACTUAL QUANTITY:

PROGRAM: SPILLS SECTION HD OBERLANDER INSPECTOR: Oberlander / Rogowski

DATE INVEST: 5/13/91 DATE CLOSED: 5/31/91 IMPACT:
NONPOINT: POINT: LUST:
ACTION TAKEN: Inspected along waterway & found no sheen CAUSE:

REFERRAL TO OUTSIDE ENTITY:
ENTITY NAME: _____ CONTACT: _____
DATE REFERRED / / PHONE ( ) -

NARRATIVE: CALLER WAS LIFTING VESSEL 'AUPULLO' INTO DRYDOCK AND A LEAK IN THE VESSEL WAS DISCOVERED - PRODUCT ESCAPED FROM STERN TUBE. 50 GAL AT THE MOST WAS LOST. HAS BEEN BOOMED AND CONTAINED AND CLEAN UP IS UNDERWAY BY AK-WA. USCG WAS CALLED. HAPPENED APPROX 06:45-07:00 THIS MORNING. SHEEN CONTAINED 150' X 150' AND ATTEMPTING TO CONTAIN SHEEN 100' X 100'.

SAMPLES YES OR NO REPORT REQUESTED YES OR NO PICTURES YES OR NO

Issuance Date: June 28, 1991
Effective Date: August 1, 1991
Expiration Date: August 1, 1996

WASHINGTON STATE DEPARTMENT OF ECOLOGY

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
WASTE DISCHARGE PERMIT

State of Washington
DEPARTMENT OF ECOLOGY
Olympia, Washington 98504-8711

In compliance with the provisions of
The State of Washington Water Pollution Control Law
Chapter 90.48 Revised Code of Washington
and
The Federal Water Pollution Control Act
(The Clean Water Act)
Title 33 United States Code, Section 1251 et seq.

AK-WA, Incorporated
401 Alexander Avenue, Building #588
Tacoma, Washington 98421

Industry Location:

401 Alexander Avenue Building #588
Tacoma, Washington 98421

Water Body I.D. No.:
WA-10-0020

Industry Type:

Ship Repair and Conversions

Receiving Water:

Hylebos Waterway
Inner Commencement Bay
Class B Marine Waters

Discharge Location:

Drydock:

001 Latitude: 47° 17' 03"
001 Longitude: 122° 24' 32"

Stormwater:
002, Latitude: 47° 17' 00"
002, Longitude: 122° 24' 26"
003, Latitude: 47° 17' 01"
003, Longitude 122° 24' 27"
004, Latitude 47° 17' 00"
004, Longitude 122° 24' 32"

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is authorized to discharge in accordance with
the special and general conditions which follow.

Megan White

Megan White, Acting Section Supervisor
Toxic Cleanup Program
Southwest Regional Office

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GENERAL CONDITIONS

DEFINITIONS

1. Maximum Daily Discharge Limitation means the highest allowable "daily discharge."

2. A "Grab" sample is a single sample or measurement taken at a specific time or over as short a period of time as is feasible.

3. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

4. "Measurable storm event" means a rainfall accumulation of 0.1 inch or more during a 24-hour period from an individual storm event.

5. "First flush" for the purposes of this permit means the first 60 minutes of a stormwater discharge following a minimum period of 72 hours without a measurable storm event.

6. "Normal Operations" means the time period when the shipyard is in use and does not apply to downtime.

7. "Hydroblasting" refers to any cleaning of vessels using a pressurized water stream. Hydroblasting discharge wastewater is a process wastewater.

8. A "composite sample" is a combination of a minimum of four individual aliquots of wastewater taken from the same wastestream at selected intervals. The composite sample shall be representative of the quality of the wastestream for the entire compositing period.

9. "Priority pollutant metals" is a group of metals specifically listed in the "Code of Federal Regulations' with priority for regulatory control (40 CFR 401.15): arsenic beryllium, antimony, cadmiun, chromium, copper, lead mercury, nickel, selenium, silver, thallium, and zinc.

10. "Volatile Organic Compounds" are the 31 purgeable organics which are detected and quantified by EPA method 624, purgeables (40 CFR 136, Appendix A).

SUMMARY OF SUBMITTALS

Permit Section	Submittal	Frequency	First Submittal Date
S3.A.	Discharge Monitoring Report	Quarterly	15 days after completed reporting period
S4.	Solid Waste Control Plan	1/permit cycle in first year	Within 12 months of permit issuance
S5.A.	Receiving Water Study	1/permit cycle in second year	Within 90 days of when sampling occurred
S6.A.	Acute Toxicity Stormwater Biomonitoring Study	4/year for 2nd year, then 1/ year thereafter	Within 60 days of when sampling occurred
S7.A.	Sediment Baseline Study Plan	1/permit cycle in second year	Within 24 months of permit issuance
S7.A.	Sediment Chemistry and Biological Toxicity Study	1/permit cycle in 3rd year	Upon plan approval
S8.	Spill Plan	Biennial	Within 6 months of permit issuance
S9.	BMP Plan (including drainage map update)	As revised	Within 3 months of permit issuance
S10.E	Spill Event Report	Annual	13 months after permit issuance
S10.C.	Storm Drain Sediment and Grit Removal Plan	1/permit cycle	Within 30 days of permit issuance
S10.C.	Storm Drain Sediment and Grit Removal Report	1/permit cycle	Final within 30 days after completion of the removal
S10.E.	Annual Assessment of Flow	Annual	First report 13 months after permit issuance
S10.G.	Hydroblasting Discharge and Engineering Report	Once	Within 6 months after permit issuance
S10.H.	Stormwater Discharge and Engineering Report	Once	Within 24 months after permit issuance

S1. EFFLUENT LIMITATIONS

A. Stormwater Discharges

Beginning on the effective date of this permit and lasting through the expiration date, the Permittee is authorized to discharge stormwater runoff at the permitted location subject to meeting the following limitations:

OUTFALL NO. 002, 003, and 004

EFFLUENT LIMITATIONS

Parameter	Monthly Average
Oil and Grease	10 mg/L[1]
Total Suspended Solids	45 mg/L
Flow	N/A
pH	6-8
TR[2] Copper	2.9 ug/L[3](25)
TR Lead	140 ug/L
TR Mercury	2.1 ug/L
TR Nickel	75 ug/L
TR Zinc	95 ug/L

The daily maximum is defined as the greatest allowable value for any calendar day. The effluent limitations for metals, based on the acute toxicity criteria, are not to be exceeded more often than once every three years. The Permittee shall ensure that the analytical detection limits are equal to or below the required effluent limits.

B. Pierside Vessels

Bilge and ballast water discharges must meet the conditions of the BMP for bilge and ballast water. There shall be no discharge of process wastes such as paint chips, grit, or any process contaminated waters from pierside vessels into the waters of the state.

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[1]Surface waters and all adjoining shorelines shall be free from floating oil, film, sheen, and discoloration.

[2]TR=Total Recoverable. All measurements of metals in effluent shall be expressed in terms of "total recoverable metal" as defined in 40 CFR Part 136.

[3]The analytical detection limit established as the Contract Required Detection Limit (CRDL) by U.S. EPA shall serve as the functional limit for this pollutant. Test methods employed for this parameter shall be those with the lowest established detection limits.

C. Hydroblasting Discharges from Drydock

Beginning on the effective date of this permit and lasting through the expiration date, the Permittee is authorized to discharge hydroblasting waste waters at the permitted location subject to the following limitations:

OUTFALL NO. 001

EFFLUENT LIMITATIONS

Parameter	Daily Maximum	Monthly Average
Oil and Grease	15 mg/L	10 mg/L
TSS	45 mg/L	30 mg/L
TR[1] Copper	2.9 ug/L[2](25)	
TR Zinc	95 ug/L	
TR Lead	140 ug/L	

D. Water Quality Standards

Discharge of stormwater, drydock water, and any process water shall not cause violations of the Water Quality Standards for Class B waters as defined in Sections 173-201-035 to 173-201-085 of the Washington Administrative Code.

S2. TESTING SCHEDULE

The Permittee shall monitor the wastewater according to the following schedule.

A. Stormwater

Commencing in the second month of this initial permit cycle, the stormwater sample shall be collected from each system in the catch basin nearest the outfall terminus or from the outfall of each storm sewer system.

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[1]TR=Total Recoverable. All measurements of metals in effluent shall be expressed in terms of "total recoverable metal" as defined in 40 CFR Part 136.

[2]The analytical detection limit established as the Contract Required Detection Limit (CRDL) by U.S. EPA shall serve as the functional limit for this pollutant. Test methods employed for this parameter shall be those with the lowest established detection limits.

Tests	Sample Point	Sampling Frequency	Sample Type
Oil and Grease	002,003,004	Monthly[1]	Grab
Total Suspended Solids	002,003,004	Monthly[1]	Grab
Flow	002,003,004	Monthly[1]	Reasonable Device or Method
pH	002,003,004	Monthly[1]	Composite
TR[2]Copper	002,003,004	Monthly[1]	Composite
TR Lead	002,003,004	Monthly[1]	Composite
TR Zinc	002,003,004	Monthly[1]	Composite
TR Nickel	002,003,004	Quarterly[1]	Composite
TR Mercury	002,003,004	Quarterly[1]	Composite
Priority Pollutant Volatile Organic Compounds	002,003,004	Quarterly[1]	Grab

B. Drydock discharges from hydroblasting

Measurement of hydroblasting wastewater will be made from samples of hydroblasting wastewater falling off the corner of the drydock deck where flow is greatest. Samples are to be collected to represent the average discharges from the entire hull wash. Total water usage during the sampled hydroblasting operation is to be reported in order to determine total loading to the waterway. A minimum of four grabs are to be composited from each sampling event. A fifth grab sample is to be analyzed for oil and grease.

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[1]Stormwater shall be monitored in each system such that one measurable first flush rain event/month is sampled during normal operations for a total of six measurable rain events (i.e., if rain does not occur during one of the first six months of the permit, sampling would occur during the seventh month of the permit). After the sixth month of monitoring data is submitted, Ecology will review the data. If volatile organic compounds are detected, the Permittee must continue monthly monitoring. If metal concentrations exceed amounts specified in Chapter 173-201 WAC, the Permittee must continue monthly monitoring and submit a report to Ecology within three months discussing alternative analyses for stormwater treatment and/or source control (see S10.H). If metals or volatile organic compounds are not discharged in toxic amounts, upon notification from Ecology, the Permittee will only be required to monitor for these parameters at a frequency of four times/yr (i.e., during a first flush of measurable rain events in fall, winter, spring, and summer).

[2]TR=Total Recoverable. All measurements of metals in effluent shall be expressed in terms of "total recoverable metal" as defined in 40 CFR Part 136.

OUTFALL NO. 001

Parameter	Sampling Frequency	Sample Type
Oil and Grease	Weekly[3]	Grab
TSS	Weekly[3]	Composite
TR Copper	Weekly[3]	Composite
TR Zinc	Weekly[3]	Composite
TR Lead	Weekly[3]	Composite
Dissolved Copper	Weekly[3]	Composite

C. Drydock Discharges at Undocking

The drydock discharge is defined as the surface water occurring on the "down current" side of the drydock during the undocking procedure. Undocking of vessels that have been repaired and in drydock for four days or more shall be monitored. Monitoring is not required of undocking performed on vessels which have been merely inspected or have undergone only minor replacement of parts. Three surface water samples are to be composited to collect a representative sample of water passing from the drydock during undocking. A similarly composited surface water sample which represents the ambient water flowing into the drydock may be collected to provide information on background levels of pollutant parameters. The following parameters are to be analyzed:

Outfall No. 001

Parameter	Minimum Frequency
Oil and Grease	Each day of undocking
Total Suspended Solids	Each day of undocking
pH	Each day of undocking
TR Zinc	Each day of undocking
TR Copper	Each day of undocking
TR Lead	Each day of undocking
Dissolved Zn	Each day of undocking
Dissolved Cu	Each day of undocking
Dissolved Pb	Each day of undocking

After one year from the permit's effective date, Ecology will review the monitoring results to determine whether effluent limits are necessary. If metal concentrations at that time exceed amounts specified in 173-201 WAC, Ecology will add effluent limitations for these toxic metals and the frequency of testing will be modified to

[3]If no hydroblasting occurs in a given week, the testing for that week is waived.

reflect the findings of the review. The frequency of testing will be reduced if monitoring indicates little variability of pollutant levels in the drydock discharge.

S3. MONITORING AND REPORTING

The Permittee shall monitor the operations and efficiency of all treatment and control facilities and the quantity and quality of the waste discharged. A record of all such data shall be maintained. The Permittee shall monitor the parameters as specified in Condition S2. of this permit. The testing of all discharges shall be performed by a laboratory accredited for the specific parameter by the Washington State Department of Ecology.

A. Reporting

Monitoring shall be started on the effective date of the permit. Monitoring results obtained during the previous three (3) months shall be summarized and reported on the Discharge Monitoring Report (DMR) Form (EPA 3320-1) and submitted no later than the 15th day of the month following the completed reporting period. The report shall be sent to the Department of Ecology, Southwest Regional Office, Mail Stop LU-11, Olympia, Washington 98504.

B. Records Retention

The Permittee shall retain for a minimum of three years all records of monitoring activities and results, including all reports of recordings from continuous monitoring instrumentation. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Permittee or when requested by the Director.

C. Recording of Results

For each measurement or sample taken, the Permittee shall record the following information: (1) the date, exact place and time of sampling; (2) who conducted the sampling; (3) the dates the analyses were performed; (4) who performed the analyses; (5) the analytical techniques or methods used; and (6) the results of all analyses. During the first or second sampling event at each outfall, the Permittee shall take one photograph of each location where samples are collected.

D. Representative Sampling

Samples and measurements taken to meet the requirements of this condition shall be representative of the volume and nature of the monitored discharge, including representative sampling of any unusual discharge or discharge condition, including bypasses, upsets and maintenance-related conditions affecting effluent quality.

E. Test Procedures

All sampling and analytical methods used to meet the monitoring requirements specified in this permit shall, unless approved otherwise in writing by Ecology, conform to the Guidelines Establishing Test Procedures for the Analysis of Pollutants, contained in 40 CFR Part 136.

F. Flow Measurement

Appropriate flow measurement devices or methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted industry standard for that type of device. Frequency of calibration shall be in conformance with manufacturer's recommendations or at a minimum frequency of at least one calibration per year.

S4. SOLID WASTE DISPOSAL

A. The Permittee shall handle and dispose of all solid waste material in such a manner as to prevent its entry into state ground or surface waters which could cause or tend to cause pollution of such waters. Spent blasting grit shall be stored in a manner that will prevent its entry into the receiving waters.

B. The Permittee shall not permit leachate from their solid waste material to enter state ground or surface waters without providing all known, available, and reasonable methods of treatment, nor allow such leachate to cause any adverse effect on state ground or surface waters. The Permittee shall apply for a permit or permit modification as may be required for such discharges.

C. The Permittee shall submit a solid waste control plan to Ecology within 12 months of permit issuance for review and approval. This plan shall include all solid wastes with the exception of those solid wastes regulated by Chapter 173-303 WAC (Dangerous Waste Regulations). The plan shall include at a minimum a description, source, generation rate, and disposal methods of these solid wastes. This plan shall not be at variance with any approved local solid waste management plan. The Permittee shall comply with the plan as approved by Ecology. Any proposed revision or modification of the approved solid waste handling plan must be submitted to Ecology for review and approval. The Permittee shall comply with any approved solid waste control plan modifications. The Permittee shall submit an update of the solid waste control plan with the application for permit renewal 180 days prior to the expiration date of the permit.

S5. RECEIVING WATER MONITORING

A. Schedule

Coinciding with a summer or autumn stormwater effluent sampling event in the second year of this permit cycle, receiving water sampling shall be conducted. The Permittee is directed to collect receiving water samples at slack tide or an incoming tide near the terminus of each outfall. The samples shall be analyzed for priority pollutant metals and volatile organic compounds. A written report of the analytical results shall be submitted to the Department within 90 days after sampling occurred.

B. Protocols

Sample analysis shall be conducted in accordance with 40 CFR Part 136 and/or Standard Methods for the Examination of Water and Wastewater, 17th Edition, 1989. Where these methods are not appropriate, an alternative method shall be designated by Ecology for use prior to sampling.

C. Quality Assurance/Quality Control Procedures

The Permittee shall follow the quality assurance procedures as outlined in 40 CFR Part 136 and/or Standard Methods for the Examination of Water and Wastewater, 17th Edition, 1989.

S6. ACUTE TOXICITY STUDY (STORMWATER)

A. Schedule

Acute toxicity testing of stormwater shall be conducted four times per year for the second year of the permit (fall, winter, spring, summer) and once every year in the spring quarter thereafter. The testing shall begin concurrently with the chemical stormwater monitoring program on the first measurable rain event that is sampled during the second year of the permit cycle. Testing shall be conducted in each storm drain system, and in accordance with protocols, monitoring requirements, and quality assurance/quality control (QA/QC) procedures specified in this section.

Testing shall be conducted for the first four test periods using two organisms: 1) *Daphnia pulex* and 2) Fathead minnow, *Pimephales promelas*.

Ecology will review the results from the acute biomonitoring to determine which species will be used in future testing. For the remainder of the permit term, testing shall be conducted twice yearly (fall, spring) using the single species chosen, with all other requirements remaining the same.